

List of PARKS' cellular telephones was telephone number (423) 343-2173 under the name "Tester".

According to telephone toll analysis, the telephones subscribed to and/or utilized by Michael TESTER (423-343-3891, 423-343-2173) attempted to contact the telephones subscribed to and/or utilized by Kari PARKS approximately 316 times between 05/18/2008 and 08/01/2009.

A criminal history check on Michael TESTER revealed the following arrests: 2004 – Domestic Assault; 2008 – Aggravated Burglary, Theft over \$1,000.00.

Michael Anthony TAYLOR

On September 6, 2007, CS-3 was arrested at the Days Inn in Bristol, TN in possession of cocaine. Also present in the motel room was Michael TAYLOR, as well as others. During a post arrest interview, CS-3 stated that the cocaine was TAYLOR's and that he obtained it from a young white female in Blountville, TN.

On March 13, 2008, Carrie Evelyn JARRETT was interviewed in Bristol, TN. JARRETT stated that she had been with Mike TAYLOR when he took delivery of cocaine from Kari PARKS at the International House of Pancakes located at exit 7 in Virginia.

On May 22, 2008, CS-6 was interviewed in Abingdon, VA. CS-6 stated that in August or September of 2007, he/she was being supplied cocaine by Matthew BRANCH. CS-6 stated that his/her friend was obtaining cocaine from Mike TAYLOR at the same time, who was being supplied by BRANCH. CS-6 stated that BRANCH was supplied the cocaine by Kari (PARKS).

On August 5, 2008, CS-11 was interviewed in Roanoke, VA. CS-11 stated that Mike TAYLOR was a source of supply of cocaine for Marcus Watkins. CS-11 stated that TAYLOR was being supplied the cocaine by Paul Thomas and an unknown female. CS-11 stated that he/she purchased ½ grams of cocaine from TAYLOR and Thomas on two (2) or three (3) occasions.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 646-7746, (423) 323-8798, (276) 466-3648, (423) 383-8813, and (423) 383-9311 under the name "Mikey T". According to the records of SunCom Wireless, telephone numbers (423) 646-7746 and (423) 383-9311 are subscribed to by James Taylor. According to the telephone directory, telephone number (276) 466-3648 returns to James R. and Robert Taylor at 3205 Memphis Ln., Bristol, VA.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Michael TAYLOR (423-646-7746, 423-323-8798, 276-466-3648, 423-383-8813, and 423-383-9311) attempted to contact Kari PARKS' cellular telephones approximately 17 times between 05/26/2008 and 07/31/2009.

A criminal history check on Mike TAYLOR revealed the following arrests: 1997 – Attempted Uttering, Breaking and Entering, Manufacture Marijuana, Larceny; 1998 – Possession

of Marijuana, Attempt to Obtain a Controlled Substance by Fraud, Attempt to Obtain Drugs by Forged Prescription, Breaking and Entering, Forgery; 2000 – Attempt to Obtain a Controlled Substance by Fraud, Theft Under \$500.00, DUI (2nd Offense), Price Altering; 2001 – Possession of a Controlled Substance, Petit Larceny; 2002 – Probation Violation; 2005 – Violation of Protection Order, Theft Under \$500.00, Criminal Impersonation; 2006 – Contempt of Court, ID Theft; 2007 – Possession of a Schedule II Controlled Substance, Solicitation to Commit a Felony.

Matthew Allen BRANCH

On February 26, 2008, Matthew BRANCH was interviewed in Bristol, TN. BRANCH stated that from June, 2007 to December, 2007, he was the live-in boyfriend of Kari PARKS. BRANCH stated that he was with PARKS everyday while she distributed cocaine to her customers. BRANCH stated that every night he helped PARKS count the days' proceeds which usually added up to \$7,000.00 to \$8,000.00. BRANCH stated that he delivered cocaine for PARKS on occasion. BRANCH stated that he delivered ounces of cocaine to Marcus WATKINS in Abingdon, VA, and ½ ounces to WATKINS in Bristol, TN. BRANCH stated that WATKINS was paying \$550.00 per ½ ounce of cocaine.

On May 22, 2008, CS-6 was interviewed in Abingdon, VA. CS-6 stated that he/she met Matthew BRANCH in August or September of 2007. CS-6 stated that he/she purchased cocaine from BRANCH in Blountville, TN on several occasions. CS-6 stated that his/her friend was obtaining cocaine from Mike TAYLOR at the same time. CS-6 stated that TAYLOR was also obtaining his cocaine from BRANCH. CS-6 stated that BRANCH was supplied the cocaine by Kari LNU, who lived near Camp Placid in Blountville, TN (Camp Placid is located within ¼ mile of 212 Neeley Dr., Blountville, TN).

CS-6 stated that he/she purchased ¼ to ½ ounce of cocaine that came from Kari LNU on a daily basis for approximately two (2) months. CS-6 stated that Kari LNU had to get the cocaine from her mother or her mother's boyfriend, who kept it locked in a safe.

On July 25, 2009, telephone number (423) 967-4401 (Matthew BRANCH) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

2:08 p.m. – (BRANCH) “*Someone just called trying to trade or sell some 4+8s.*”
2:11 p.m. – (BRANCH) “*Do y wanna do something? Let me know love u.*”
2:48 p.m. – (BRANCH) “*Will u let me have a couple subs so I can get me some gas an cigarettes an I will pay u back Monday.*”
3:10 p.m. – (PARKS) “*Yes I will. Why did u ask me like that?*”

On July 26, 2009, telephone number (423) 967-4401 (Matthew BRANCH) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

4:55 p.m. – (PARKS) “*...but that seems 2b all u wanna do is fight n bitch at me all the time...Drugs is all we fight over, and money...I am tryn to get shit so u will have money n stuff...*”

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Matthew BRANCH were in furtherance of drug trafficking activities. I believe that BRANCH arranged a drug transaction for PARKS and PARKS admitted to fighting with BRANCH over drugs and money.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones was telephone number (423) 967-4401 under the name "My Baby" and "Matt". Telephone numbers (423) 968-1535, (423) 967-9951, and (423) 366-2836 were also saved under the name "Matt" with an address of 340 Raytheon Rd., Bristol, TN (residential address of Matthew BRANCH). Also saved to the phones were photographs of PARKS with Matthew BRANCH that were dated July 21, 2009.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Matthew BRANCH (423-967-4401, 423-968-1535) attempted to contact Shannon HUTSON's cellular telephones approximately 88 times between 07/27/2009 and 09/10/2009. The telephones subscribed to and/or utilized by Matthew BRANCH attempted to contact Kari PARKS' cellular telephones approximately 815 times between 09/09/2008 and 07/27/2009.

A criminal history check on Matt BRANCH revealed the following arrests: 2001 – Assault and Battery; 2004 – Theft over \$500.00; 2005 – Burglary, Theft over \$1,000.00, Vandalism; 2007 – Forgery, Uttering; 2008 – Burglary, Larceny, Bad Check, Forgery, ID Theft.

Lloyd Earl LEONARD, AKA "CORKY"

On November 3, 2006, CS-1 was interviewed in Blountville, TN. CS-1 stated that "CORKY" was a methamphetamine distributor for Donna Thomas. CS-1 stated that on one occasion, "CORKY" told him/her that he ("CORKY") and Thomas had just picked up three (3) pounds of methamphetamine. CS-1 stated that he/she observed "CORKY" with one (1) to two (2) ounces of methamphetamine on at least 12 different occasions. CS-1 stated that he/she had also observed "CORKY" in possession of at least 100 tablets of Ecstasy and one (1) ounce of Mushrooms. CS-1 described "CORKY" as a white male, shaved head, with tattoos on his neck.

On January 17, 2007, CS-2 was interviewed in Johnson City, TN. CS-2 stated that Lloyd LEONARD, AKA "CORKY", was a methamphetamine distributor for Tony Trivette (who was subsequently indicted for methamphetamine distribution in the Eastern District of Tennessee). CS-2 also stated that Phil Gray, Kacy Kite, Adam Hughes, and Todd Felty (all of whom were subsequently arrested for the distribution of methamphetamine) were methamphetamine distributors for Trivette. CS-2 stated that Shannon PARKS (HUTSON) was involved in the distribution of methamphetamine with LEONARD.

On June 12, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Kristin Gray. Gray told HUTSON that "CORKY" was disrespectful to her. Gray stated to HUTSON, "I don't need his Goddamned dope...go talk to his dope whores like that."

On September 18, 2008, CS-13 arranged to purchase \$200.00 worth of crack cocaine from Lloyd LEONARD in Piney Flats, TN. The purchase took place in the women's restroom of

the McDonald's. CS-13 did not know the female who delivered the crack cocaine, but positively identified Kari PARKS from a photo lineup as the person who sold the cocaine to the CS.

On September 27, 2008, Lloyd LEONARD placed a telephone call from the Sullivan County Jail to telephone number (423) 646-6320 and spoke with Kari PARKS. LEONARD and PARKS spoke about using methamphetamine and cocaine. LEONARD told PARKS, "there's not too many people who can do as many drugs as we've done and not do them now. You know how much cocaine you and me have consumed in our life and done personally? Now we don't even do it. You see how it's consumed other people?"

LEONARD told PARKS to be careful with whom she dealt, especially Mikey Marshall. LEONARD stated, "I ain't never *sold* nothin' to Mikey. I'll *give* him anything he wants." LEONARD stated, "I've always been real smart about who I deal with, you know that. A lot of people think I'm crazy, but I'm not that crazy, I'm careful." LEONARD stated that he used to be bad, he'd "rob a motherfucker real quick", but he was never a snitch.

On May 1, 2009, CS-21 was interviewed in Bristol, VA. CS-21 stated that Lloyd LEONARD, AKA "CORKY", was a cocaine and OxyContin distributor for Kari PARKS.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones was telephone number (423) 833-1352 under the name "Corky".

On August 10, 2009, CS-28 was interviewed in Johnson City, TN. CS-28 stated that he/she and "CORKY" supplied each other with methamphetamine and pills. CS-28 described "CORKY" as a tall, skinny white male with a bald head.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Lloyd LEONARD (423-833-1352) attempted to contact Kari PARKS' cellular telephones approximately 80 times between 08/12/2008 and 09/03/2008.

A criminal history check on Lloyd LEONARD revealed the following arrests: 2000 – Possession of a Schedule IV Controlled Substance; 2001 – Probation Violation; 2003 – Probation Violation; 2004 – Domestic Assault, Aggravated Domestic Assault; 2005 – Theft of less than \$500.00; 2006 – Obtaining Drugs by Fraud, Fugitive from Justice; 2008 – Fugitive from Justice.

Bobby Lee WHITE

On February 26, 2008, Matthew BRANCH was interviewed in Bristol, TN. BRANCH stated that from June, 2007 to December, 2007, he was the live-in boyfriend of Kari PARKS. BRANCH stated that he was with PARKS everyday while she distributed cocaine to her customers. BRANCH stated that PARKS delivered cocaine to a white male known to him only as "Bob".

On February 2, 2009, surveillance was conducted on Kari PARKS. Surveillance units followed PARKS to the parking lot of the Interstate Bowl located at 2178 Linden Dr., Bristol,

VA. Surveillance observed PARKS meet with an unidentified white male (subsequently identified as Bob WHITE) who entered the passenger side of her silver Honda Pilot. After approximately two (2) minutes, surveillance observed WHITE exit the Honda Pilot and enter the passenger side of a black Chevrolet Blazer. PARKS departed the area at this time. After approximately one (1) minute, surveillance observed WHITE exit the Blazer and enter the passenger side of a silver Cadillac, TN license ITS JJH, which then departed. Surveillance was maintained on the Blazer and observed the occupant engage in behavior consistent with intravenous drug use. Based on my training and experience, I believe that the aforementioned behavior was consistent with a drug transaction.

The records of the State of Tennessee revealed that TN license ITS JJH returned to a 2005 Cadillac registered at 1112 Holston Ave., Bristol, TN.

According to the records of Sprint, communications between telephone number (423) 646-6320 (Kari PARKS) and telephone number (423) 383-1925 were attempted approximately 15 times on that date prior to the aforementioned transaction. There were two (2) telephone calls and one (1) text message during the five (5) minutes prior to the transaction. The subscriber to telephone number (423) 383-1925 is Cynthia White at 1112 Holston Ave., Bristol, TN.

On February 25, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

3:10 p.m. – (WHITE) “I’m on 394 food city need 2 baby.”
3:14 p.m. – (PARKS) “K on way.”
4:29 p.m. – (PARKS) “Love u Bob baby.”

On March 1, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

5:53 p.m. – (PARKS) “Baby can u get nething?”
6:08 p.m. – (WHITE) “How many you need?”
6:14 p.m. – (WHITE) “Cars 30s and 80s.”
6:14 p.m. – (PARKS) “How much r they baby?”
6:15 p.m. – (WHITE) “80 for 80.”
6:53 p.m. – (PARKS) “Its okay baby ill just want I can gat n bout hour 4 7.”
7:05 p.m. – (WHITE) “Ok that was the best I could do. Love you Kari.”

On March 11, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

12:35 p.m. – (PARKS) “I love u Bob WHITE!!!!!!”
2:26 p.m. – (WHITE) “Baby I need 1.”
8:08 p.m. – (PARKS) “U can come to blountville if u want im on my way home now...”

On March 14, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

4:08 p.m. – (WHITE) “Baby I need 2.”
4:15 p.m. – (PARKS) “Okay baby I gotta go to the parkway to get some money so I can get them. I will have to come back home to get them.”

On March 15, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the

following text message communications with telephone number (423) 646-6320 (Kari PARKS):

1:56 p.m. – (WHITE) “*Baby I need 50 tabs can u help?*”

1:56 p.m. - (PARKS) “*When mom gets back.*”

1:58 p.m. - (WHITE) “*What size? How much?*”

1:58 p.m. - (PARKS) “*10s 4 6.*”

On March 16, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

2:06 p.m. – (WHITE) “*Can you still get the tabs? And how long will it take?*”

2:23 p.m. – (WHITE) “*Baby can I meet u 4 a car?*”

2:38 p.m. – (PARKS) “*Baby ask him if he wants some bigs 4 55 or 60.*”

2:48 p.m. – (WHITE) “*Yes can we do all of it at 5. Not sure how many but should be quite a few.*”

On March 19, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

4:01 p.m. – (WHITE) “*I still n?ed the big ones. What’s the best you can do on a hundred on those small ones?*”

4:02 p.m. – (PARKS) “*6.*”

4:04 p.m. – (WHITE) “*Where you wanna meet?*”

4:07 p.m. – (WHITE) “*I’ll take a hundred. It’ll help if when can do this as quick as possible.*”

4:17 p.m. – (PARKS) “*There is only 50.*”

4:18 p.m. – (WHITE) “*Okay I’ll take them.*”

5:54 p.m. – (PARKS) “*Should I give him a half a thing 4 that baby? Be sure to tell him I said thank u and thank u too baby. THANK U SO MUCH!!!!!! Did u make something? I love u Bob!*”

5:59 p.m. – (WHITE) “*No you don’t owe anyone. Thanks for giving me a break on them. I was able to make one. I LOVE YOU BABY!!!!!!*”

On March 26, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

11:58 a.m. – (WHITE) “*I need 15 baby.*”

12:33 p.m. – (PARKS) “*Okay love u – baby can u get me another new thing? I will give a half for a couple of them.*”

12:35 p.m. – (WHITE) “*Ok love u.*”

On March 31, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

3:09 p.m. – (WHITE) “*Baby I need 100 little ones.*”

3:51 p.m. – (PARKS) “*Food coun.*”

On April 2, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

4:47 p.m. – (WHITE) “*I n?ed 3 and a half. Please text me and let me know your not asleep.*”

4:49 p.m. – (PARKS) “*Ok b there n min.*”

On July 19, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

3:40 p.m. – (WHITE) “*Baby I need 1.*”
3:41 p.m. – (PARKS) “*K just min I will meet u.*”
6:38 p.m. – (WHITE) “*Baby can I get 1 and a half? Love u.*”
8:15 p.m. – (PARKS) “*U want?*”

On July 20, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

1:22 p.m. – (WHITE) “*I need 3 baby.*”
1:59 p.m. – (PARKS) “*Hang on a min gotta meet them.*”
6:33 p.m. – (PARKS) “*U want any other stuff baby? Or know nebody that does?*”
7:41 p.m. – (WHITE) “*Baby can u get 2 big and any little one?*”

On July 21, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

12:01 p.m. – (WHITE) “*Baby need 9 love u.*”
12:13 p.m. – (PARKS) “*Okay it will take me a min to go get them baby. Is that okay?*”
12:16 p.m. – (WHITE) “*U got 4 baby?*”
12:17 p.m. – (PARKS) “*U want 4 or 9 baby? Im goin to get em.*”

On July 25, 2009, telephone number (423) 383-1925 (Bob WHITE) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

6:09 p.m. – (PARKS) “*U need ne? 75.*”
6:13 p.m. – (WHITE) “*Yes baby me and Lane need 1.*”
7:05 p.m. – (WHITE) “*Baby I need 2 or 3 it will be 20 min ok.*”
7:16 p.m. – (WHITE) “*Need 2. On my way. Where to?*”
7:33 p.m. – (WHITE) “*Pullin up at the store.*”
8:11 p.m. – (PARKS) “*I love u Bob White.*”
8:15 p.m. – (WHITE) “*I love u 2 – baby –*”

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Bobby WHITE were in furtherance of drug trafficking activities. I believe that PARKS supplied WHITE with large amounts of cocaine and OxyContin.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS’ cellular telephones was telephone number (423) 383-1925 under the name “Bob”.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Bobby WHITE (423-383-1925) attempted to contact Kari PARKS’ cellular telephones approximately 3,839 times between 11/06/2008 and 07/29/2009.

A criminal history check on Bob WHITE revealed the following arrests: 1976 – Burglary; 1978 – DWI; 1981 – Larceny; 2007 – Price Altering; 2008 – Violation of Probation.

Jeffrey James HOWELL

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY provided detailed information regarding Rhonda HUTSON, Shannon HUTSON, and Jr. STILTNER. HENSLEY stated that customers of the Drug Trafficking Organization included Jeff HOWELL, Robert PARKS, Josh SNYPES, Sam HUTSON, Bryan PROFFITT, and others. HENSLEY stated that HOWELL received approximately three (3) to four (4) ounces of cocaine per week from the organization.

On February 20, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communication with telephone number (423) 646-6320 (Kari PARKS):

12:01 p.m. – (HOWELL) “Hey u have 6 or 7?”
12:12 p.m. – (PARKS) “Hey.”
12:13 p.m. – (HOWELL) “Hey. U have 5 to 7 of em?”
12:17 p.m. – (PARKS) “Yea.”
12:17 p.m. – (HOWELL) “When ban I meet ya?”
12:20 p.m. – (PARKS) “U got the money?”
12:22 p.m. – (HOWELL) “They said bout 30 or 45 mins. Sorry thought they was ready.”
1:05 p.m. – (HOWELL) “I have to leave for work asap. Can I meet you for a half of one real quick. The other guy went to Judy. So I cant get a whole one now.”
3:32 p.m. – (HOWELL) “What time u have to head out? Need 2 or 3 but I have to run to jc first.”

On February 21, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communication with telephone number (423) 646-6320 (Kari PARKS):

2:43 p.m. – (HOWELL) “Can I come see ya in a few mins...2”
2:44 p.m. – (PARKS) “Yea how many?”
2:45 p.m. – (HOWELL) “2. Maybe 3. I have to call Scott.”
2:51 p.m. – (PARKS) “K. Let me know.”

On February 22, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communication with telephone number (423) 646-6320 (Kari PARKS):

2:19 p.m. – (HOWELL) “Got somebody callin me if u get into anything.”
2:31 p.m. – (PARKS) “Yea.”
2:56 p.m. – (HOWELL) “Where to. I can meet ya n bout 30.”
3:09 p.m. – (PARKS) “Yea just come this way.”

On February 24, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communication with telephone number (423) 646-6320 (Kari PARKS):

12:21 p.m. – (HOWELL) “7 or 8. But I need 2 know asap.”
1:20 p.m. – (PARKS) “When I get outta school.”

On March 10, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the

following text message communication with telephone number (423) 646-6320 (Kari PARKS):

4:13 p.m. – (PARKS) “*U want the other one? If so stop at store.*”
4:40 p.m. – (HOWELL) “*4 of em. I have to hurry though. Im supposed to be on my way to the next job.*”
6:57 p.m. – (HOWELL) “*Did I give u 20 to much? I was short when I took back his money. Im not sure if I was shorted by them on the 3 or what I did but he thinks I stole it.*”
7:39 p.m. – (PARKS) “*U give me \$5 extra that all. I tried to text u n tell u to come back but then my phone died.*”
7:41 p.m. – (HOWELL) “*K. I screwed up somewhere. Thx for letting me know. I gave em half of mine that somebody covered me til Friday. So they didn't think I got em.*”
8:01 p.m. – (HOWELL) “*He wants that now. Are u busy?*”
8:11 p.m. – (PARKS) “*Come on.*”
8:15 p.m. – (HOWELL) “*K. I have to ask Earl 4 a ride then run over by east. Then on my way.*”

On March 15, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications:

2:56 p.m. – (PARKS to Jeff HOWELL) “*Hey baby call me.*”
4:28 p.m. – (PARKS to Ryan HILTON) “*Did u find nething?*”
4:29 p.m. – (HILTON to PARKS) “*None.*”
4:30 p.m. – (PARKS to HILTON) “*K I think I found some.*”
4:30 p.m. – (HOWELL to PARKS) “*U can go get em. If u call right back. Call Nate 274-4177.*”
5:35 p.m. – (PARKS to HOWELL) “*I got a couple. I will keep u a half one cause I gotta give Bob a half one too. Cause he helped me out.*”
7:11 p.m. – (HOWELL to PARKS) “*He have big ones yet?*”
7:15 p.m. – (HOWELL to PARKS) “*Please don't get them for Ryan. That's how I was gonna make one.*”
9:32 p.m. – (Ryan HILTON to PARKS) “*Call me Jeff's callin please thanks.*”
10:02 p.m. – (HILTON to PARKS) “*I got a couple from Jeff to avoid conflict love u baby sleep good.*”

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Jeff HOWELL were in furtherance of drug trafficking activities. I believe that PARKS supplied HOWELL with large amounts of cocaine and OxyContin.

On March 27, 2009, a consent search was conducted by the Washington County (TN) Sheriff's Office at 3616 N. Roan St., Apt. #4, Johnson City, TN, residence of Daniel Anthony COSBY. Pursuant to the consent search, detectives seized approximately 150 dosage units of 80 mg OxyContin, ½ ounce of marijuana, \$12,810.00 U.S. Currency, three (3) handguns, two (2) boxes of ammunition, drug ledgers, and miscellaneous indicia. A lock box was discovered in the apartment that COSBY stated belonged to Shannon HUTSON. A search warrant was obtained and executed on the lock box, which contained miscellaneous indicia in the names of April S. HUTSON/ROARK/CROSS including automobile titles, real estate transactions, receipts for

purchases, and expenditures of large amounts of cash. Also included in the miscellaneous indicia was a letter to April HUTSON from Bristol West Insurance Group regarding an automobile accident involving Jeffrey HOWELL (dated 07/28/2008).

On April 17, 2009, Lloyd LEONARD was interviewed in Bristol, VA. LEONARD stated that he had purchased cocaine from Jeff HOWELL. LEONARD stated that HOWELL used to obtain ½ kilograms of cocaine from Shannon HUTSON. LEONARD stated that HOWELL also used Kari PARKS as a source of supply for drugs. LEONARD stated that he had been around Jeff HOWELL when HOWELL bragged about HUTSON and large amounts of cocaine.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of one of HUTSON's cellular telephones was telephone number (423) 652-7535 under the name "Jeff".

On July 10, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communications with telephone number (423) 534-4518 (Kari PARKS):

3:25 p.m. – (HOWELL) "Hey."
3:50 p.m. – (PARKS) "70."
3:53 p.m. – (HOWELL) "6 or 7. So far."
4:34 p.m. – (HOWELL) "Let me know. Call me. Im afraid there gonna go over here in bltyl."
8:28 p.m. – (HOWELL) "Please tell me something u always leave me hanging. U would be upset if I ignored you and u needed my help. I don't understand. I told them people that I could help them or I wouldn't even be textin you."

On July 20, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

8:35 p.m. – (PARKS) "75. I'm making 5 on them."
8:53 p.m. – (PARKS) "U got the money?"
8:53 p.m. – (HOWELL) "20 mins."
8:54 p.m. – (HOWELL) "In bout 5 10 mins."
8:57 p.m. – (PARKS) "K I don't want nobody to know bout me n u b alone."

On July 21, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

1:29 p.m. – (HOWELL) "Help."
1:29 p.m. – (PARKS) "How many?"
1:31 p.m. – (HOWELL) "4"
1:35 p.m. – (HOWELL) "5 now."
1:40 p.m. – (HOWELL) "How long?"
1:42 p.m. – (PARKS) "Doin it now I will call u n min."
1:50 p.m. – (HOWELL) "How much 70?"

On July 24, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the

following text message communications with telephone number (423) 646-6320 (Kari PARKS):

6:19 p.m. – (HOWELL) “*Hey. Kevin just screwed me. Will u help me. Ive got somebodys cash.*”

On July 26, 2009, telephone number (423) 646-8120 (Jeff HOWELL) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

2:06 p.m. – (PARKS) “*Get money together.*”

2:09 p.m. – (PARKS) “*Im goin to get them.*”

4:54 p.m. – (HOWELL) “*Call right back. He has to hurry. He can only wait a few mins on ya...*”

9:01 p.m. – (PARKS) “*Stop calln over n over! That makes me mad and u know that Jeff! I'm on the way.*”

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Jeff HOWELL were in furtherance of drug trafficking activities. I believe that PARKS supplied HOWELL with large amounts of cocaine and OxyContin.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS’ cellular telephones were telephone numbers (423) 646-8120 and (423) 652-7535 under the name “Jeff” and “Jeffo”.

On December 9, 2009, CS-33 was interviewed in Blountville, TN. CS-33 stated that Jeff HOWELL used to be a distributor of cocaine for Shannon HUTSON. CS-33 stated that HUTSON allowed very few people to pick up drugs at her residence, but HOWELL was allowed since he was dating Kari PARKS. CS-33 stated that HOWELL picked up multiple ounces of cocaine at a time from HUTSON, and made many trips.

According to the records of T-Mobile, the subscriber to telephone number (423) 646-8120 is Earl Canter. According to the telephone directory, telephone number (423) 652-7535 is assigned to the residence located at 108 Brookshire Dr., Bristol, TN in the name of Earl Canter. According to AutoTrackXP, 108 Brookshire Dr., Bristol, TN is listed as an address for Jeffery J. HOWELL. According to directions provided by Lloyd LEONARD, Jeff HOWELL resides at 108 Brookshire Dr., Bristol, TN.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Jeff HOWELL (423-646-8120, 423-652-7535, 423-742-1842) attempted to contact Shannon HUTSON’s cellular telephones approximately 249 times between 09/22/2008 and 09/07/2009. The telephones subscribed to and/or utilized by Jeff HOWELL attempted to contact Kari PARKS’ cellular telephones approximately 2,355 times between 11/06/2008 and 07/30/2009.

A criminal history check on Jeff HOWELL revealed the following arrests: 2006 – Worthless Checks; 2008 – Simple Assault.

Ryan C. HILTON

On January 29, 2009, surveillance was conducted on Kari PARKS. Surveillance units followed PARKS to an apartment complex located at 3616 N. Roan St., Johnson City, TN. PARKS parked her silver Honda Pilot next to a white Chevrolet Tahoe registered to Daniel COSBY at that address, Apt., #4. Approximately ten (10) minutes later, PARKS exited Apt. #4 and was followed to a Chevron Gas Station/Carwash where she parked in a carwash stall. Approximately ten (10) minutes later, an unknown white male, subsequently identified as Ryan HILTON, arrived in a blue Nissan Maxima and entered the passenger side of PARKS' vehicle. Approximately five (5) minutes later, HILTON exited PARKS' vehicle and departed in the Maxima. Based on my training and experience, I believe that the aforementioned behavior was consistent with a drug transaction.

On February 12, 2009, surveillance was conducted on Kari PARKS. Surveillance units followed PARKS to the aforementioned Chevron Gas Station/Carwash where she parked in a carwash stall. Approximately five (5) minutes later, surveillance observed Ryan HILTON arrive in his Nissan Maxima and enter the passenger side of PARKS' vehicle (silver Honda Pilot). After approximately five (5) minutes, HILTON exited PARKS' vehicle and departed in his Maxima. Based on my training and experience, I believe that the aforementioned behavior was consistent with a drug transaction.

On February 20, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

6:02 a.m. – (HILTON) “Hey baby I had a scare last night I got pulled over had to eat everything I had with me so im out of everything can I meet u as soon as u can I wouldn’t ask if it weren’t an emergency love you baby...”
1:59 p.m. – (HILTON) “U close baby?”
2:08 p.m. – (PARKS) “Im on my way baby.”
2:34 p.m. – (HILTON) “Ok baby save me 7.”

On February 24, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

1:56 p.m. – (HILTON) “...can we do 10?”
2:08 p.m. – (PARKS) “K I gotta hurry cause they r already waitin on me at the track I got get money n meet her.”
2:13 p.m. – (PARKS) “...I gotta go back near the track n get ill c ya n a min. Love u.”
3:29 p.m. – (PARKS) “I’m coming baby they wanted 80 4 them so I went to c if I could get cheaper but mom wont have til tonight so I checked somewhere else no luck so I just got them 4 80 which really sucked baby.”
3:32 p.m. – (HILTON) “Did u get some?”
3:33 p.m. – (PARKS) “Yes I got them where u at?”

On February 27, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

7:18 a.m. – (HILTON) “U have any luck?”

8:04 a.m. – (PARKS) “*How many?*”
8:05 a.m. – (HILTON) “3.”
8:07 a.m. – (HILTON) “*Three im at work.*”
8:10 a.m. – (HILTON) “*Four.*”
8:50 a.m. – (PARKS) “*Can u meet at fc?*”

On March 1, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications:

6:47 p.m. – (Ryan HILTON to PARKS) “*I'm feelin sick r u?*”
6:48 p.m. – (PARKS to HILTON) “*How many baby?*”
6:49 p.m. – (HILTON to PARKS) “*I can do 7.*”
6:50 p.m. – (PARKS to HILTON) “*Okay baby it wont b to much longer.*”
9:26 p.m. – (PARKS to Shannon HUTSON) “*Where yal at?*”
9:27 p.m. – (HUTSON to PARKS) “*15 min.*”
9:44 p.m. – (PARKS to HILTON) “*Hey baby.*”
9:45 p.m. – (PARKS to HILTON) “*U up? If u r im good.*”

On March 2, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

10:34 a.m. – (HILTON) “*Do u have anything left im really bad today.*”
10:34 a.m. – (PARKS) “*Its okay baby do u need to c me?*”
10:35 a.m. – (HILTON) “*Oh yea im bad.*”
12:32 p.m. – (PARKS) “*Sorry I fell asleep how many baby?*”
12:33 p.m. – (HILTON) “*How much r they?*”
12:41 p.m. – (PARKS) “*75.*”
12:44 p.m. – (HILTON) “*I have to be in Piney at 3:15 can I meet around 2:45? Total of 6.*”
12:49 p.m. – (PARKS) “*Yes baby I still have 7 4 u if u need em just let me know when ur ready.*”
12:52 p.m. – (HILTON) “*Is 2:45 ok w/ you I can prob. Get 7 thanks 4 saving 4 me love u.*”

On March 3, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

7:28 p.m. – (HILTON) “*Hey baby meet me at food city at 9 on the bank side love u c u soon*”
7:34 p.m. – (PARKS) “*How many baby doll?*”
7:40 p.m. – (HILTON) “*I can only do 5.*”
7:41 p.m. – (PARKS) “*K love u.*”

On March 11, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

5:45 p.m. – (HILTON) “*Havent heard from u any thing goin on?*”
8:32 p.m. – (PARKS) “*Baby im sorry where u at my love? How many? Let me know. Love u.*”
8:40 p.m. – (HILTON) “*Im sorry 4 callin so much im at work if u can do 10 be great love*”

u can u come to store?"

On March 13, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

2:41 p.m. – (HILTON) “*Hey baby I was gonna try to c u today I gave u some cash yesterday I dnt know how much I know more than 6 if u can help w/ price we 'll call even I lost \$520 Saturday and some yesterday can u help me find something im out I know not your fault I need 2 dig out of this hole love u please text me baby.*”

On March 14, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

4:05 p.m. – (PARKS) “*How many baby doll?*”
4:08 p.m. – (HILTON) “*As many up to 10 ill get a little 4 u.*”
4:10 p.m. – (PARKS) “*Okay baby get the money 2gether and im working something out right now – love u baby.*”
4:11 p.m. – (HILTON) “*Okay baby ill be ready.*”

On March 16, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

12:38 p.m. – (HILTON) “*Hey baby girl what s the good time today?*”
12:45 p.m. – (PARKS) “*How many?*”
12:46 p.m. – (HILTON) “*Prob 6 or 7.*”
12:46 p.m. – (PARKS) “*K.*”
1:11 p.m. – (PARKS) “*Im waitin on her to text me back n let me know where to come too baby I gotta come ur way neways so I will bring to u.*”
2:38 p.m. – (HILTON) “*Baby got to be back at work at 6:30.*”
3:39 p.m. – “*Im waitin on her to get here. It will b b4 then.*”

On March 30, 2009, telephone number (423) 646-9995 (Ryan HILTON) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

3:47 p.m. – (HILTON) “*Gettin close I need to run Cooper home to piney and come to u thanks baby. Lookin about four thirty.*”
4:11 p.m. – (HILTON) “*Let 's wait cause I want couple more like ten my ex will be at store at seven pm to get her check is eight pm ok baby.*”
4:20 p.m. – (PARKS) “*Yea that's fine baby.*”

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Ryan HILTON were in furtherance of drug trafficking activities. I believe that PARKS supplied HILTON with multiple dosage units of OxyContin on a daily basis for distribution.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones was telephone number (423) 646-9995 under the name “Ryan”.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Ryan

HILTON (423-646-9995, 423-646-9990) attempted to contact Kari PARKS' cellular telephones approximately 4,460 times between 11/06/2008 and 07/23/2009.

A criminal history check on Ryan HILTON revealed no previous arrests.

Randall William CROSS (AKA Randy CROSS, Randy PARKS)

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that Randy PARKS was the son of Rhonda HUTSON. KINCER stated that he purchased approximately 1/8 ounce of cocaine to one (1) ounce of cocaine from PARKS on approximately fifteen (15) occasions. KINCER stated that PARKS charged \$175.00 to \$200.00 per 1/8 ounce and \$1,000.00 to \$1,200.00 per ounce of cocaine.

KINCER stated that PARKS resided with HUTSON on Broyles Ln. in Bristol, TN. KINCER stated that the cocaine transactions with PARKS occurred in the driveway of HUTSON's residence. KINCER stated that on occasion, PARKS had to go to the residence of Nate LNU to obtain the cocaine. KINCER stated that Nate LNU resided in the Bristol Heights Trailer Park on Weaver Pike.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of cocaine. In a subsequent interview, HILLIARD stated that in 2007, he was told by Randy PARKS and Bryan PROFFITT that they were awaiting a delivery of cocaine from Shannon HUTSON. HILLIARD stated that approximately two (2) or three (3) weeks ago, PARKS offered to sell cocaine to HILLIARD at the Cedar Creek Store.

On February 23, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications:

6:31 a.m. – (Randy CROSS, utilizing Junior STILTNER's cellular telephone, to PARKS)
"I flipped my car runnin from the law. I'm goin to rehab."

7:34 a.m. – (Shannon HUTSON to PARKS) *"Randy had a wreck last night and ran from the law then left the hosp w iv n his arm."*

On February 28, 2009, telephone number (423) 340-2194 (Junior STILTNER's telephone being used by Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

9:07 p.m. – (PARKS) "Hey."
9:08 p.m. – (CROSS) "Whats up?"
9:08 p.m. – (PARKS) "Whos this?"
9:09 p.m. – (CROSS) "Ur kuz."
9:11 p.m. – (PARKS) "Where is Jr. at?"
9:12 p.m. – (CROSS) "Right here."

9:16 p.m. – (PARKS) "Ask him if he can get me like 20-25 from N. I got the \$."

9:23 p.m. – (Junior STILTNER to PARKS) "We out til ur mom gets back."

9:28 p.m. – (PARKS to CROSS) "Ive been texting him on his other num. But he hasn't text me back but im goin to bed if he can do that let me know whe left n didn't have here. But if he don't have that many a few woudl b fine. I love ya. Tell Jr. to call me tomorrow anyways I need to talk to him. Good night sweet dreams love ya."

On March 1, 2009, telephone number (423) 484-1220 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

2:53 p.m. – (CROSS) “*I need 1 those got cash.*”
2:57 p.m. – (CROSS) “*Can I get 1 or what?*”
3:29 p.m. – (CROSS) “*I need 1 those can u do it or not?*”
3:33 p.m. – (CROSS) “*That's fuked up what mom tell u not to deal with me?*”
3:49 p.m. – (CROSS) “*Whats tha deal I wont say nothing to mom.*”
5:52 p.m. – (PARKS) “*What the fuck Randy???? Y the fuck u been a dick to me. Like I care what ur mom says about it. I don't fucking have nothing.*”
5:54 p.m. – (CROSS) “*Sorry mom told everybody else to cut me off jus thought she told u to.*”
5:56 p.m. – (PARKS) “*Yea n has that ever mattered to me Randy?*”
6:07 p.m. – (CROSS) “*No sorry but I aint had 1 in 2 days n Nat jus got some n sayen he aint got none that's bullshit.*”

On March 16, 2009, telephone number (423) 646-1081 (Randy CROSS utilizing Rhonda HUTSON's cell phone) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

10:07 p.m. – (CROSS) “*Im gettin ready to leave moms how much r they?*”
10:11 p.m. – (PARKS) “*8. She wont let u use her phone? Moms not back so u may have to come here but if she gets home she will get if anybody comes here so can u call from a pay phone?*”
10:12 p.m. – (CROSS) “*Ya ill call from Jr. phone he aint that far from u.*”
10:47 p.m. – (PARKS to Junior STILTNER) “*Have u seen Randy? If u c him tell him to please call I gotta go to bed soon.*”

On March 19, 2009, telephone number (423) 484-1220 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

5:44 p.m. – (CROSS) “*I got a lowes card.*”
5:50 p.m. – (CROSS) “*U get that shit dude wanted?*”
5:50 p.m. – (PARKS) “*Okay come this way.*”
6:00 p.m. – (CROSS) “*I got 1 them things too.*”
6:06 p.m. – (CROSS) “*Where u want to meet at I got u a dart.*”
9:25 p.m. – (CROSS) “*Need 3 n a half cars.*”
9:34 p.m. – (PARKS) “*Call me.*”
9:44 p.m. – (CROSS) “*Cant please come n get me im near exit 3.*”
10:20 p.m. – (PARKS) “*Im almost home. Let me know something. The law is EVERYWHERE!!!!!! I gotta get in the bed soon – I got school in the AM. Love ya.*”

On March 28, 2009, telephone number (423) 383-2304 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

12:11 p.m. – (CROSS) “*U got any dones?*”
1:20 p.m. – (CROSS) “*U get that from him or mom its ur kuz.*”
1:50 p.m. – (CROSS) “*Its Randy. U got any subs?*”
2:24 p.m. – (CROSS) “*U got any subs? Did they pay u or what?*”

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones was telephone number (423) 383-8690 under the name "Randy C", telephone number (423) 534-4412 under the name "RC", and telephone number (423) 963-8597 under the name "Randy Cross".

On July 23, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications:

3:09 p.m. – PARKS negotiated a sale of "subs" (Suboxone) to Jennifer Nelson. PARKS asked Nelson if she had any "cars" (Oxycodone). Nelson stated to PARKS that "Randy said he could get sum..."

3:41 p.m. – (PARKS to Randy CROSS) "Thank u so much. U gonna b there a min.? I need more."

5:52 p.m. – PARKS received an order of 1 from Lane LNU and 5 from Bob WHITE.

6:07 p.m. – (PARKS to CROSS) "6 get them ready 4 me bout to pull n."

6:16 p.m. – (PARKS to CROSS) "I cant believe u think id do that to u iz hurts my feelings u know I aint like that Randy love u b over there n min."

On July 24, 2009, telephone number (423) 967-3768 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

10:59 a.m. – (PARKS) "Where u at?"

11:01 a.m. – (CROSS) "Ceader creek store."

11:37 a.m. – (PARKS) "U come this way n meet me?"

11:57 a.m. – (CROSS) "Why?"

11:59 a.m. – (PARKS) "I need one them or two maybe."

12:01 p.m. – (CROSS) "Ya where?"

12:46 p.m. – (CROSS) "Can u get a game n how much?"

12:48 p.m. – (PARKS) "It will b a min b4 I re up."

On July 25, 2009, telephone number (423) 967-3768 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

1:27 p.m. – (PARKS) "He wants to know if u could do a half 4 7.5 subs right now. I told him u would do a whole n a little bit and he is still aggravating me."

1:28 p.m. – (CROSS) "Ya ill do that."

On July 27, 2009, telephone number (423) 967-3768 (Randy CROSS) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

12:23 p.m. – (CROSS) "Call if u need any those n c dude wants to dn that again on tha subs."

12:24 p.m. – (PARKS) "U want any stuff?"

12:26 p.m. – (CROSS) "Ya u want 1 for a 16?"

12:26 p.m. – (PARKS) "Will u do it 4 11?"

12:38 p.m. – (PARKS) "Yea bring weights n come this way."

4:17 p.m. – (CROSS) "I need another one."

4:18 p.m. – (PARKS) "Well where u at?"

Based on my training and experience, I believe that the preceding text message communications between Kari PARKS and Randy CROSS were in furtherance of drug trafficking activities. I believe that PARKS supplied CROSS with cocaine, OxyContin, and Suboxone. I believe that CROSS supplied PARKS with OxyContin when she was out.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones was telephone number (423) 967-3768 under the name "Rc", and telephone numbers (423) 383-2304, (423) 963-8597, (423) 646-1081, and (423) 646-1398 under the name "Randy".

On September 24, 2009, CS-30 was interviewed in Abingdon, VA. CS-30 stated that in 2008, after his/her release from prison, he/she got a job from Rhonda HUTSON hanging siding for Mid-South Guttering. CS-30 stated that HUTSON trusted him/her and had several conversations with him/her regarding her (HUTSON's) drug dealing. CS-30 stated that HUTSON told him/her that her son, Randy CROSS, had stolen between \$30,000.00 and \$40,000.00 U.S. Currency from her, as well as 500 pills. CS-30 stated that HUTSON told him/her that CROSS also stole a kilogram of cocaine from a storage unit that she previously rented.

CS-30 stated that he/she knew Randy CROSS as a distributor of cocaine and pills. CS-30 stated that CROSS was supplied these drugs to sell by Junior STILTNER, without Rhonda HUTSON's knowledge.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Randy CROSS (423-967-3768, 423-383-2304, 423-963-8597, 423-646-1081, and 423-646-1398) attempted to contact Kari PARKS' cellular telephones approximately 516 times between 05/30/2008 and 07/27/2009.

A criminal history check on Randy CROSS revealed the following arrests: 2004 – Possession of Marijuana, Possession of a Prohibited Weapon; 2007 – Possession of a Controlled Substance, Criminal Impersonation, Burglary.

Rhonda Kaye HUTSON (AKA Rhonda Kay SHAFFER)

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that he had been selling cocaine since 2003. STEVENS stated that he began by purchasing ounces at a time from Rhonda HUTSON. STEVENS stated that after approximately six (6) months, he started purchasing multiple ounces at a time from HUTSON. STEVENS stated that after HUTSON was released from jail in 2005, he obtained 20 ounces of cocaine per week from her for approximately six (6) months. STEVENS stated that he was paying HUTSON \$22,000.00 for 20 ounces of cocaine. STEVENS stated that on one occasion, the 20 ounces was cut straight off of a full kilo which was wrapped in plastic cellophane and brown tape. STEVENS stated that the kilogram of cocaine was stamped with an eagle. STEVENS stated that HUTSON cut him back to five (5) ounces of cocaine per week due to a \$16,000.00 debt.

On January 16, 2008, a controlled purchase of cocaine was made from Raymond HILLIARD. The CS purchased approximately $\frac{1}{4}$ ounce of cocaine from HILLIARD for \$400.00. While waiting for the transaction to occur, the CS engaged in conversation with a person who identified himself as "Junior's" cousin. This person said to the CS that he didn't get his "stuff" from Junior because Junior "cut his stuff real bad." This person said to the CS that he got Rhonda to "cut his stuff off" because she didn't add "stuff" to it. This person said to the CS that he obtained about ten (10) ounces of cocaine per week from Rhonda.

On February 8, 2008, CS-4 was interviewed in Bristol, TN. CS-4 stated that approximately three (3) years ago, he/she had an affair with Kari PARKS. CS-4 stated that he/she purchased small amounts of cocaine from PARKS during their relationship. CS-4 stated that PARKS informed him/her that her mom, Shannon HUTSON, and her aunt, Rhonda HUTSON, were her (PARKS') cocaine suppliers.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that he was the live-in boyfriend of Rhonda HUTSON from November, 2006 to March, 2007. HENSLEY stated that they resided together at 208 Broyles Ln., Bristol, TN. HENSLEY stated that during the time they were together, Rhonda HUTSON sold approximately one (1) kilogram of cocaine per week. HENSLEY stated that Rhonda HUTSON received approximately ten (10) ounces of cocaine at a time from her sister, Shannon HUTSON. HENSLEY stated that at times, Rhonda HUTSON obtained 15 to 20 ounces of cocaine from Shannon HUTSON. HENSLEY stated that Shannon HUTSON charged Rhonda HUTSON \$8,500.00 for ten (10) ounces of cocaine, but sometimes the price fluctuated as high as \$1,000.00 to \$1,200.00 per ounce. HENSLEY stated that he personally observed Rhonda HUTSON in possession of one (1) kilogram of cocaine. HENSLEY stated that he had overheard conversations between Shannon and Rhonda HUTSON regarding large amounts of money needed to replenish their supply of cocaine. HENSLEY stated that he helped Rhonda HUTSON count between \$50,000.00 and \$60,000.00 every two (2) to three (3) weeks during their relationship (approximately one year). HENSLEY stated that HUTSON also sold prescription pills she obtained out of New York and marijuana she obtained from Florida.

HENSLEY stated that prior to their break up, he and Rhonda HUTSON made trips to Exit 50 (on I-81) in Greene County, TN to deliver two (2) to three (3) ounces of cocaine to Gordie STEVENS, sometimes twice a day. HENSLEY stated that HUTSON was charging STEVENS \$1,100.00 per ounce. HENSLEY stated that when HUTSON discovered that STEVENS was selling the cocaine to Raymond HILLIARD for \$1,400.00 per ounce, HUTSON began dealing directly with HILLIARD.

HENSLEY stated that Rhonda HUTSON had a separate source of supply for cocaine in Greensboro, NC. HENSLEY stated that he accompanied HUTSON on two (2) different trips, in which they picked up 26 ounces of cocaine and 32 ounces of cocaine, respectively. HENSLEY stated that HUTSON made a third trip without him, taking other people instead, and was robbed for \$20,000.00 as the supplier never returned with the cocaine.

HENSLEY stated that he and Rhonda HUTSON began a business together called Mid-South Seamless Guttering, which was run from HUTSON's residence located at 208 Broyles Ln., Bristol, TN. HENSLEY stated that HUTSON used drug proceeds (cash) to purchase materials and tools for the business. HENSLEY stated that HUTSON began the company for the

purpose of covering up all the drug traffic coming to and from the house.

HENSLEY stated that Shannon HUTSON, Rhonda HUTSON, and Kari PARKS utilized several different cellular telephones to communicate. HENSLEY stated that Shannon and Rhonda HUTSON utilized the text messaging service on their cell phones to communicate.

On June 5, 2008, CS-9 was interviewed in Bristol, VA. CS-9 stated that he/she was introduced to Bryan LNU (Last Name Unknown) during the summer of 2006. CS-9 stated that he/she purchased approximately three (3) to four (4) grams of cocaine per week from Bryan LNU for \$200.00. CS-9 stated that he/she went with Bryan LNU to the residence of Rhonda HUTSON on several occasions to pick up an ounce of cocaine. CS-9 stated that he/she observed Bryan LNU and Rhonda HUTSON engage in drug transactions on approximately five (5) to ten (10) different occasions. CS-9 stated that he/she also observed Bryan LNU engage in drug transactions with unknown males on the front porch of HUTSON's residence. CS-9 identified HUTSON's residence as 208 Broyles Ln., Bristol, TN.

On June 26, 2008, Michael Dale TESTER was interviewed in Blountville, TN. TESTER stated that he met Rhonda HUTSON through Chuck HENSLEY, who was living with HUTSON at the time on Broyles Ln. in Bristol, TN. TESTER knew HENSLEY through the seamless guttering business. TESTER stated that he purchased cocaine from Rhonda HUTSON at her residence, and that she charged him \$1,100.00 per ounce. TESTER stated that HUTSON also supplied him with OxyContin, Lortab, and anything else requested by his work crew. TESTER stated that he personally observed multiple pounds of marijuana and $\frac{1}{2}$ to one (1) kilogram of cocaine in a safe located in HUTSON's residence.

On July 1, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Rhonda HUTSON. Rhonda HUTSON told Sam HUTSON that she was glad that Sam beat up Chucky (HENSLEY) because he was a "snitch". Rhonda HUTSON stated to Sam HUTSON that she could get anybody beat up, anywhere in the state of Tennessee.

On July 10, 2008, CS-10 was interviewed in Blountville, TN. CS-10 stated that Rhonda HUTSON was a distributor of prescription pills including OxyContin, Lortab, and "Totem Poles" (Xanax). CS-10 stated that HUTSON had the pills brought up from Florida in milk jugs. CS-10 stated that Chucky HENSLEY, a "runner" for HUTSON, delivered Lortab, Percocet, and OxyContin to his/her residence for his/her spouse.

On September 23, 2008, CS-14 was interviewed in Kingsport, TN. CS-14 stated that he/she had purchased marijuana and small amounts of cocaine from Rhonda HUTSON at HUTSON's residence. CS-14 stated that HUTSON dealt cocaine with Raymond HILLIARD.

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that Rhonda HUTSON was a large scale cocaine distributor in Bristol, TN. KINCER stated that in 2007, he accompanied Paul Thomas to the residence of HUTSON approximately every four (4) or five (5) days for four (4) or five (5) months to purchase cocaine. KINCER stated that Thomas obtained approximately ten (10) ounces of cocaine on each trip to HUTSON's residence. KINCER stated that in or about December, 2006, he observed HUTSON in possession of one kilogram of cocaine.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of $\frac{1}{2}$ ounce of cocaine. In a subsequent interview, HILLIARD stated that he entered the "drug business" in 2005 when he met Junior STILTNER. HILLIARD stated that he purchased $\frac{1}{2}$ ounces of cocaine from STILTNER once every week or two for approximately six (6) months. HILLIARD stated that he picked up the cocaine at the residence of Rhonda HUTSON two (2) or three (3) times a month, as directed by STILTNER. HILLIARD stated that HUTSON lived on Broyles Ln. in Bristol, TN. HILLIARD stated that when Rhonda HUTSON ran out of cocaine, nobody in the Holston Valley Community of Bristol, TN had access to cocaine.

On April 17, 2009, Lloyd LEONARD was interviewed in Bristol, VA. LEONARD stated that he once rode with Tim Green to Rhonda HUTSON's residence to purchase cocaine. LEONARD stated that he remained in the vehicle while Green went inside the residence. LEONARD stated that when Green came back to the vehicle, he was in possession of one (1) ounce of cocaine.

On May 13, 2009, CS-22 was interviewed in Abingdon, VA. CS-22 stated that Jackson Mabe was a cocaine distributor for Junior STILTNER. CS-22 stated that on several occasions when Mabe went to STILTNER's residence to pick up cocaine, STILTNER was not there. CS-22 stated that Mabe told him/her that Rhonda STILTNER (HUTSON) had provided the cocaine to him (MABE).

CS-22 stated that many years ago, Rhonda STILTNER (HUTSON), Shannon PARKS (HUTSON), and Sam HUTSON lived with their mom (Phyllis AMOS) on Flatwood Rd. in Hickory Tree, TN. CS-22 stated that he/she lived nearby and knew the family. CS-22 stated that he/she made small purchases of cocaine, no more than "8 balls" (1/8 ounce of cocaine), from Rhonda, Shannon and Sam. CS-22 stated that Sam HUTSON also sold him $\frac{1}{4}$ pounds of marijuana.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones were telephone numbers (423) 646-1081 and (423) 340-0837 under the name "Rhonda".

On July 7, 2009, CS-25 was interviewed in Abingdon, VA. CS-25 stated that he/she used to live on Broyles Ln., across from Rhonda HUTSON. CS-25 stated that HUTSON had a reputation as a large scale distributor of OxyContin, cocaine, and marijuana. CS-25 stated that there was constant vehicular traffic in and out of HUTSON's residence. CS-25 described HUTSON's residence as a double wide trailer with a front porch, above ground pool, detached two car garage, and numerous vehicles, boats, etc. parked in the yard.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. PARKS stated that she used to live with her aunt, Rhonda HUTSON. PARKS stated that she observed Rhonda HUTSON sell cocaine and marijuana while living with her. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 878-3608 and (423) 340-0837 under the name "Rhonda".

On August 19, 2009, Nathan STILTNER was interviewed in Blountville, TN. STILTNER stated that for four (4) or five (5) months in 2008, he was a user of cocaine. STILTNER stated that his source of supply for cocaine was his cousin, Junior STILTNER, and Rhonda HUTSON. STILTNER stated that he purchased only \$100.00 to \$200.00 worth of cocaine at a time.

On September 24, 2009, CS-30 was interviewed in Abingdon, VA. CS-30 stated that he/she had known Rhonda HUTSON since 1985. CS-30 stated that in 1991 and 1992, HUTSON supplied him/her with marijuana.

CS-30 stated that in 2008, after his/her release from prison, he/she got a job from HUTSON hanging siding for Mid-South Guttering. CS-30 stated that HUTSON trusted him/her and had several conversations with him/her regarding her (HUTSON's) drug dealing. CS-30 stated that HUTSON told him/her that she had made more money than she ever thought she could by selling drugs. CS-30 stated that HUTSON told him/her that she purchased her residence on Broyles Ln. with drug money.

CS-30 stated that HUTSON told him/her that her son, Randy CROSS, had stolen between \$30,000.00 and \$40,000.00 U.S. Currency from her, as well as 500 pills. CS-30 stated that HUTSON told him/her that CROSS also stole a kilogram of cocaine from a storage unit that she used to rent.

CS-30 stated that in early 2009, he/she drove HUTSON to New York on two (2) occasions and Jacksonville, FL once. CS-30 stated that upon their return from Florida, CS-30 overheard HUTSON and Junior STILTNER discussing 2,000 OxyContins. CS-30 stated that he/she heard STILTNER ask HUTSON if she received what was owed to her. CS-30 stated that he/she observed a large amount of pills and several stacks of U.S. Currency contained within a safe located outside of HUTSON's bedroom. CS-30 stated that once he/she realized that he/she had been used as a transporter, he/she stopped his relationship with HUTSON.

On December 9, 2009, CS-33 was interviewed in Blountville, TN. CS-33 stated that Rhonda HUTSON and Shannon HUTSON were in the drug business together. CS-33 stated that Shannon HUTSON was Rhonda HUTSON's source of supply, but that Rhonda HUTSON eventually found her own source of supply. CS-33 stated that he/she was with Shannon HUTSON on several occasions when HUTSON dropped off cocaine at the residence of Rhonda HUTSON.

CS-33 stated that Rhonda HUTSON and Junior STILTNER had a guttering business that was originally started to cover up their drug proceeds.

A financial analysis of Rhonda HUTSON was conducted by Special Agent Trevor McMurray, IRS. As it has been established within this affidavit, Rhonda HUTSON started a business called Mid-South Seamless Guttering for the purpose of covering up all the drug traffic coming to and from her residence. Bank records were obtained for accounts in the name of Mid-South Seamless Guttering. From October 2006 until March 2009, there was in excess of \$275,000 deposited in to the bank account of Mid-South Seamless Guttering at The First Bank and Trust Company. During this same time frame, \$244,000 was spent out of the account.

Upon further analysis of the deposits, it appears there were a few cash deposits, but the majority of these deposits were what appear to be customer checks. It appears there are

legitimate business deposits into this account, however, it appears there are very few disbursements that are business related. Most of the expenditures appear to be personal in nature. Rhonda HUTSON paid several credit card companies out of this account none of which were in the name of Mid-South Seamless Guttering. There were various car payments, motorcycle payments in nominee names, retail store credit cards, medical services, vacation services, etc.

The chart below represents disbursements out of the Mid-South Seamless Guttering Account that are to individuals known to be involved in the trafficking of illegal narcotics, or that are personal in nature and not associated with any legitimate known business purpose:

Cash Disbursements out of	
the account	\$29,615.00
Johnny Stiltner	\$ 5,880.00
Rhonda Hutson	\$ 7,252.00
Randall Cross	\$ 4,060.10
Tri-Cities Center for	
Cosmetic Dentistry	\$ 3,500.00
Blue Green Resorts	\$ 4,560.05
Harley Davidson (Account in	
Nominee Name)	\$ 5,400.00
Bob, Bob White, Bob Light	<u>\$ 5,200.00</u>
Various Disbursements	<u>\$65,467.15</u>

It is common for individuals involved in the trafficking of illegal narcotics to engage in unexplained financial transactions. It is also common for them to engage in financial transactions dealing with cash only. This type of activity is consistent with the banking activity associated with this particular bank account. Although it appears the deposits may be legitimate, the disbursements are personal in nature. It is probable that the payment for supplies and materials to conduct the business are being paid for with cash.

Upon analysis of Rhonda HUTSON's income tax records via Ex-Parte order, it was found that in 2006 she filed an individual 1040 with a Schedule C for Mid-South Seamless Guttering. She showed total income of \$34,481 with Cost of Goods Sold \$23,189. The net income from operating the business was \$9,362. According to the Internal Revenue Service data base, Rhonda HUTSON has not filed any returns for 2007 or 2008.

According to that same Internal Revenue Service database, Rhonda HUTSON received \$31,510 in 1099's from other contractors \$35,188 for 2007 and \$22,504 for 2008. During 2007, R. HUTSON deposited \$89,622.53 into her business checking account and in 2008, she deposited \$130,078.19.

Based on the financial institution and tax records analysis, and information received from associates, it appears that Rhonda HUTSON started Mid-South Seamless Guttering, not for the purpose of running a legitimate business, but for covering up her drug activity.

A criminal history check on Rhonda HUTSON revealed the following arrests: 1988 – Shoplifting; 1995 – Possession of Marijuana for Resale; 2001 – (TN) Possession of Controlled Substance, Possession of Marijuana for Resale, Tampering with Evidence, (VA) Manufacture, Sale, Possession of a Controlled Substance (Cocaine); 2004 – Aggravated Assault.

John Raymond STILTNER, Jr. (AKA “Junior”)

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that he had been obtaining large amounts of cocaine from Rhonda HUTSON for years. STEVENS stated that “Junior” STILTNER was Rhonda HUTSON’s boyfriend. STEVENS stated that he purchased “8 balls” of cocaine from STILTNER at HUTSON’s residence.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that Junior STILTNER was Rhonda HUTSON’s boyfriend. HENSLEY stated that STILTNER sold cocaine and collected drug debts for HUTSON. HENSLEY stated that STILTNER was a cocaine source of supply for Gordie STEVENS, Raymond HILLIARD, Nathan STILTNER, and Clyde STILTNER, as well as others.

On July 3, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Junior STILTNER. STILTNER stated that there were tires to sell and he did not have any. HUTSON told STILTNER that he (HUTSON) could hook STILTNER up with a number.

On June 4, 2008, Robert PARKS called Shannon HUTSON from the Sullivan County Jail. PARKS and HUTSON discussed Junior STILTNER being used by Rhonda (HUTSON) to “fuck peoples shit up” who owed money to Rhonda.

On June 5, 2008, CS-9 was interviewed in Bristol, VA. CS-9 stated that Bryan LNU was his/her source of supply for cocaine starting in the summer of 2006. CS-9 stated that, on one occasion when Bryan LNU was out of town (summer of 2007), he (Bryan LNU) provided CS-9 with the telephone number of Junior STILTNER for the purpose of obtaining cocaine. CS-9 stated that STILTNER was also out of town and told him/her to call Paul Thomas. CS-9 stated that after the first purchase with Thomas, he/she began to purchase $\frac{1}{2}$ ounce to one (1) ounce of cocaine from Thomas on a daily basis.

On June 26, 2008, Michael Dale TESTER was interviewed in Blountville, TN. TESTER stated that Junior STILTNER was a cocaine distributor for Rhonda HUTSON. TESTER stated that STILTNER and HUTSON sold cocaine at the Corner Pocket Billiards Club in Bristol, TN.

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that Junior STILTNER was the boyfriend of Rhonda HUTSON and they owned a guttering and vinyl business together. KINCER stated that his father, Dewayne Jones, obtained one (1) to $1\frac{1}{2}$ ounces of cocaine several times a day from HUTSON and STILTNER. KINCER stated that Jones would sell several ounces of cocaine a day to Raymond HILLIARD.

On December 12, 2008, CS-15 was interviewed in Abingdon, VA. CS-15 stated that he/she and Mitchell Young had stolen a stackable washer and dryer, guns, a Playstation machine,

and jewelry from a residence in Washington County, VA. CS-15 stated that he/she and Young took the property to "Junior" on Broyles Ln. in Bristol, TN. CS-15 stated that "Junior" paid Young for the stolen property with ten (10) dosage units of OxyContin.

On December 12, 2008, a State of Tennessee search warrant was executed at 208 Broyles Ln., Bristol, TN. Pursuant to the search warrant, Junior STILTNER was interviewed regarding stolen property. STILTNER stated that he had purchased the property from Mitchell Young. STILTNER stated that he had purchased a Playstation machine, some guns, a stackable washer and dryer, and other items. STILTNER stated that the washer and dryer were located at the residence of Phyllis AMOS. In an effort to cooperate with law enforcement, STILTNER offered to purchase cocaine from Raymond HILLIARD.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of $\frac{1}{2}$ ounce of cocaine. In a subsequent interview, HILLIARD stated that he entered the "drug business" in 2005 when he met Junior STILTNER. HILLIARD stated that he began purchasing "8 balls" (1/8 ounce) of cocaine from STILTNER for \$200.00, but quickly graduated to multiple "8 balls" and then $\frac{1}{2}$ ounces of cocaine at a time. HILLIARD stated that he purchased $\frac{1}{2}$ ounces of cocaine from STILTNER once every week or two for approximately six (6) months. HILLIARD stated that Junior STILTNER wanted him to sell more cocaine, but HILLIARD was apprehensive as he did not want to get caught. HILLIARD stated that Junior STILTNER supplied Nathan STILTNER with cocaine.

On January 14, 2009, CS-18 was arrested with Raymond HILLIARD. In a subsequent interview, CS-18 stated that he/she had personally observed ounces of cocaine at HILLIARD's residence. CS-18 stated that the ounces were usually present immediately following a visit by Junior STILTNER.

On February 24, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications with telephone numbers (423) 340-2194 and (423) 366-8072 (Junior STILTNER):

11:11 a.m. – (PARKS) "Hey."
11:12 a.m. – (PARKS) "Hey."
11:12 a.m. – (STILTNER) "Ya."
11:14 a.m. – (PARKS) "Did u get yet?"
11:14 a.m. – (STILTNER) "No."
11:17 a.m. – (PARKS) "K. Is Randy okay today?"
11:18 a.m. – (STILTNER) "Sleepn."
11:23 a.m. – (PARKS) "...Let me know if u get. Love ya."
11:24 a.m. – (STILTNER) "K. Luv u 2."

On February 28, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications:

9:16 p.m. – In an attempt to contact Junior STILTNER, PARKS made contact with Randy CROSS on telephone number 423-340-2194. PARKS sent the following text message – "Ask him if he can get me like 20-25 from N. I got the \$."
9:23 p.m. – (STILTNER to PARKS) "We out til ur mom gets back."

On March 27, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications with telephone number (423) 366-8072 (Junior STILTNER):

9:32 p.m. – (PARKS) “*Y didn't u text me yesterday? I wanna pay u. Its bothering me. Text me 2morrow so I can pay u some. I get outta school at 3-3:30. So text me then.*”

On March 30, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications with telephone number (423) 366-8072 (Junior STILTNER):

8:41 a.m. – (PARKS) “*Hey, I will have some more 4 u this afternoon so call or text me then. Love ya.*”

Based on my training and experience, I believe that the preceding text message communications between Junior STILTNER and Kari PARKS were in furtherance of drug trafficking activities. I believe that STILTNER supplied PARKS with cocaine and OxyContin.

On May 13, 2009, CS-22 was interviewed in Abingdon, VA. CS-22 stated that Jackson Mabe was a distributor of cocaine for Junior STILTNER. CS-22 stated that in 2008, he/she accompanied Mabe to STILTNER's residence on a daily basis for approximately six (6) to eight (8) months to pick up one (1) to three (3) ounces of cocaine each day. CS-22 stated that Mabe paid STILTNER \$1,000.00 to \$1,200.00 per ounce of cocaine. CS-22 stated that STILTNER “fronted” the cocaine to Mabe, who repaid STILTNER after it was distributed. CS-22 stated that Mabe ended up owing STILTNER approximately \$10,000.00 in drug debts.

CS-22 stated that he/she purchased cocaine directly from Junior STILTNER on approximately two (2) or three (3) occasions, over $\frac{1}{2}$ ounce each time. CS-22 stated that STILTNER gave grams of cocaine to him/her on numerous occasions for no charge. CS-22 stated that STILTNER's cocaine was “pure and uncut”.

CS-22 stated that Gordie STEVENS was a cocaine distributor for Junior STILTNER. CS-22 stated that on one occasion, STEVENS traded a gold Toyota SUV to STILTNER for cocaine. CS-22 stated that STILTNER had Jackson Mabe copy the ignition key to the Toyota, then “dispose” of the vehicle so that STILTNER could report it stolen and collect the insurance. (According to the records of the Bristol, Tennessee Police Department, a silver 1997 Toyota 4-Runner was reported stolen by John Raymond STILTNER on March 16, 2008 at the Corner Pocket Billiards in Bristol, TN. The registered owner of the vehicle was Rhonda Kaye HUTSON.)

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that he/she used to reside with Junior STILTNER in the Bristol Heights Trailer Park in Bristol, TN. CS-24 stated that STILTNER sold a lot of pills, marijuana, and cocaine. CS-24 stated that he/she heard from Jackson Mabe that STILTNER was supplied his drugs by Rhonda LNU (Last Name Unknown). CS-24 stated that Rhonda LNU lived in a double wide trailer with a swimming pool in front, located on Broyles Ln. in Bristol, TN. CS-24 stated that STILTNER currently resided with Rhonda LNU.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in

possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones was telephone number (423) 340-2194 under the name "Junior".

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 340-2194, (423) 366-8072, and (423) 383-2722 under the name "Jr", and telephone numbers (423) 484-7476, (423) 573-1660, and (423) 646-6267 under the name "JR".

On August 19, 2009, Nathan STILTNER was interviewed in Blountville, TN. STILTNER stated that for four (4) or five (5) months in 2008, he was a user of cocaine. STILTNER stated that his source of supply for cocaine was his cousin, Junior STILTNER, and Rhonda HUTSON. STILTNER stated that he purchased only \$100.00 to \$200.00 worth of cocaine at a time.

On September 24, 2009, CS-30 was interviewed in Abingdon, VA. CS-30 stated that in early 2009, he/she drove Rhonda HUTSON to New York on two (2) occasions and Jacksonville, FL once. CS-30 stated that upon their return from Florida, CS-30 overheard HUTSON and Junior STILTNER discussing 2,000 OxyContins. CS-30 stated that he/she heard STILTNER ask HUTSON if she received what was owed to her. CS-30 stated that he/she observed a large amount of pills and several stacks of U.S. Currency contained within a safe located outside of HUTSON's bedroom.

CS-30 stated that he/she knew Randy CROSS as a distributor of cocaine and pills. CS-30 stated that CROSS was supplied these drugs to sell by Junior STILTNER, without Rhonda HUTSON's knowledge.

On December 9, 2009, CS-33 was interviewed in Blountville, TN. CS-33 stated that Rhonda HUTSON and Shannon HUTSON were in the drug business together. CS-33 stated that Junior STILTNER was Rhonda HUTSON's boyfriend and a distributor of drugs for her. CS-33 stated that Rhonda HUTSON and STILTNER began a guttering business to cover up their drug proceeds. CS-33 stated that STILTNER paid the workers of the business with drugs.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Junior STILTNER (423-340-2194, 423-366-8072) attempted to contact Shannon HUTSON's cellular telephones approximately 493 times between 02/01/2008 and 08/23/2009. The telephones subscribed to and/or utilized by Junior STILTNER attempted to contact Kari PARKS' cellular telephones approximately 300 times between 07/11/2008 and 07/23/2009.

A criminal history check on Junior STILTNER revealed the following arrests: 1996 – Burglary, Larceny, Shoplifting; 2005 – Altering a Serial Number Fraudulently; 2008 – Theft over \$1,000.00.

Gordie Lee STEVENS

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that he had been selling cocaine since 2003. STEVENS stated that he began by

purchasing ounces at a time from Rhonda HUTSON. STEVENS stated that after approximately six (6) months, he started purchasing multiple ounces at a time from HUTSON. STEVENS stated that after HUTSON was released from jail in 2005, he obtained 20 ounces of cocaine per week from her for approximately six (6) months. STEVENS stated that he was paying HUTSON \$22,000.00 for 20 ounces of cocaine.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that prior to their breakup, he and Rhonda HUTSON made trips to Exit 50 (on I-81) in Greene County, TN to deliver two (2) to three (3) ounces of cocaine to Gordie STEVENS, sometimes twice a day. HENSLEY stated that HUTSON was charging STEVENS \$1,100.00 per ounce. HENSLEY stated that when HUTSON discovered that STEVENS was selling the cocaine to Raymond HILLIARD for \$1,400.00 per ounce, HUTSON began dealing directly with HILLIARD.

HENSLEY stated that Junior STILTNER was a cocaine source of supply for Gordie STEVENS, Raymond HILLIARD, Nathan STILTNER, and Clyde STILTNER, as well as others. On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of cocaine. In a subsequent interview, HILLIARD stated that Gordie STEVENS told him that STEVENS used to purchase ten (10) to fifteen (15) ounces of cocaine at a time from Rhonda HUTSON.

On May 13, 2009, CS-22 was interviewed in Abingdon, VA. CS-22 stated that Gordie STEVENS was a cocaine distributor for Junior STILTNER. CS-22 stated that on one occasion, STEVENS traded a gold Toyota SUV to STILTNER for cocaine.

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that in 2004, he/she and Archie Stone began purchasing cocaine from Gordie STEVENS and Raymond HILLIARD. CS-24 stated that the transactions with STEVENS occurred at several properties owned by STEVENS in Sullivan County, TN. CS-24 stated that in 2006, he/she and Archie Stone purchased approximately ¼ ounce to ½ ounce of cocaine from STEVENS every day until STEVENS was incarcerated on drug charges. CS-24 stated that Jackson Mabe used to obtain twenty (20) to forty (40) "pieces" of cocaine at a time from Gordie STEVENS.

On July 7, 2009, CS-25 was interviewed in Abingdon, VA. CS-25 stated that Gordie STEVENS was a large scale cocaine and marijuana distributor who supplied most of the "Holston Valley" community for years. CS-25 stated that STEVENS was the source of supply for Raymond HILLIARD and others. CS-25 stated that he/she had purchased cocaine directly from STEVENS on approximately five (5) occasions, between 1/8 ounce and one (1) ounce at a time.

A criminal history check on Gordie STEVENS revealed the following arrests: 1978 – Transportation of Intoxicating Liquor; 2002 – Aggravated Assault; 2005 – Domestic Assault, Aggravated Assault; 2007 – Possession of Schedule II for Resale, Possession of a Schedule II, Simple Possession of a Schedule III, Unlawful Drug Paraphernalia, Resisting Arrest, Felony Evading Arrest.

Raymond Stanley HILLIARD / April Dawn HILLIARD

In October, 2005, a controlled purchase of cocaine was made from Raymond HILLIARD in Bristol, TN. On October 22, 2005, a search warrant was executed at 260 Booher Dr., Bristol, TN, the residence of HILLIARD. Seized pursuant to the search warrant were small amounts of white powder, digital scales, plastic baggies with the corners cut off, burnt spoons, various unidentified pills, and a marijuana pipe containing marijuana.

On December 13, 2007, a controlled purchase of cocaine was made from Raymond HILLIARD by an SCSO CS. The CS purchased 1/8 ounce of cocaine from HILLIARD for \$200.00. The CS talked to HILLIARD about selling cocaine again. HILLIARD told the CS that he would help the CS out and could get the CS 1/2 ounce of cocaine with which to start.

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that between 2004 and 2005, he became addicted and smoked cocaine exclusively for approximately one (1) year. STEVENS stated that he spent approximately \$65,000.00 on cocaine that year. STEVENS stated that he obtained that cocaine from Raymond HILLIARD, Bobby NELSON, and Dave Holt. STEVENS stated that eventually he became the source of supply for HILLIARD. STEVENS stated that on one occasion, he obtained 15 ounces of cocaine from Rhonda HUTSON and left it with HILLIARD. STEVENS stated that HILLIARD sold all 15 ounces, and STEVENS made \$1,400.00 per ounce that HILLIARD sold. STEVENS stated that eventually, HILLIARD got into debt with STEVENS for \$14,000.00.

On January 16, 2008, another controlled purchase of cocaine was made from Raymond HILLIARD by an SCSO CS. The CS purchased approximately 1/4 ounce of cocaine from HILLIARD for \$400.00.

On February 4, 2008, Gary Wayne Felty was arrested in possession of 1/2 gram of crack cocaine in Sullivan County, TN. Felty stated to officers that he had just purchased the cocaine at the residence of Raymond HILLIARD for \$50.00.

On February 5, 2008, a State of Tennessee search warrant was executed at 260 Booher Dr., Bristol, TN – the residence of Raymond and April HILLIARD. Also present at the residence was Samuel Swayne HUTSON and Callie Eads. Seized pursuant to the search warrant were four (4) crack pipes, three (3) sets of digital scales, other drug paraphernalia with cocaine residue, a cane sword, and \$961.00 in U.S. Currency. Raymond and April HILLIARD, as well as Sam HUTSON were arrested.

On February 8, 2008, CS-4 was interviewed in Bristol, TN. CS-4 stated that approximately three (3) years ago, he/she had an affair with Kari PARKS. CS-4 stated that he/she purchased small amounts of cocaine from PARKS during their relationship. CS-4 stated that PARKS informed him/her that her mom, Shannon HUTSON, and her aunt, Rhonda HUTSON, were her (PARKS') cocaine suppliers. CS-4 stated that Shannon HUTSON was the cocaine supplier to Bobby NELSON and Raymond HILLIARD.

On February 15, 2008, CS-5 was interviewed in Bristol, TN. CS-5 stated that he/she had purchased cocaine from Raymond HILLIARD at his residence on approximately 15 to 20

occasions. CS-5 stated that HILLIARD's source of supply for cocaine was Nathan STILTNER. CS-5 stated that on at least one (1) occasion, he/she drove April HILLIARD to STILTNER's trailer to pick up cocaine for Raymond HILLIARD.

On March 11, 2008, a controlled purchase of crack cocaine was made from Raymond HILLIARD at his residence located at 260 Booher Dr., Bristol, TN. Prior to the purchase, the CS called HILLIARD at telephone number (423) 383-1437 and ordered two (2) grams. The actual purchase was for 1.4 grams of crack cocaine for \$200.00.

On March 13, 2008, Carrie Evelyn JARRETT was interviewed in Bristol, TN. JARRETT stated that between June and August, 2007, she obtained ½ to 1 gram of cocaine two (2) to three (3) times a week from Raymond HILLIARD. JARRETT stated that HILLIARD cooked the cocaine into crack cocaine in various locations throughout his home. JARRETT stated that she and April HILLIARD smoked the cocaine in the HILLIARD residence. JARRETT stated that she was present when Raymond HILLIARD "dispatched" people to go pick up cocaine.

On March 22, 2008, Paul Thomas was shot and killed by Sullivan County, TN Deputy Kevin Morrell following a high speed chase. Seized from Thomas' vehicle following the incident were approximately one (1) ounce of cocaine and three cellular telephones. Contained in one cell phone were the following text messages from telephone number (423) 383-1347 (saved in the Contacts List under Raymond):

March 14, 2008 at 1:00 a.m. – *"It's Ray. Let me o whats up if tonight r not. People wanting. I'm going to have to do something. Thanks. Ray."*
March 18, 2008 at 4:08 a.m. – *"I have 2 people waiting. I need to no either way so ill o what to do. Call me please. Raymond."*
March 18, 2008 at 4:43 a.m. – *"Paul I have people here that rely on me and I realy on u. Let us no u r ok that nothing has happen u guys, ok. I will come to u I got ur?..."*

Based on my training and experience, I believe that the preceding text message communications between Raymond HILLIARD and Paul Thomas were in furtherance of drug trafficking activities. I believe that Thomas supplied HILLIARD with cocaine.

On May 1, 2008, Waleed Gaffar Elderini was interviewed in Abingdon, VA. Elderini stated that he had received cocaine from Raymond HILLIARD on approximately twenty (20) occasions. Elderini stated that he traded his Ford Taurus to HILLIARD for cocaine. Elderini stated that the cocaine started out in powder form, but HILLIARD "rocked it up" for Elderini in HILLIARD's residence. The most cocaine that Elderini saw HILLIARD in possession of was one (1) ounce. Elderini described HILLIARD's residence as being located at the top of an awkward driveway with surveillance cameras everywhere. Elderini stated that HILLIARD lived in the Hickory Tree section of Bristol, TN, off of Weaver Pike.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that prior to their breakup, he and Rhonda HUTSON made trips to Exit 50 (on I-81) in Greene County, TN to deliver two (2) to three (3) ounces of cocaine to Gordie STEVENS,

sometimes twice a day. HENSLEY stated that HUTSON was charging STEVENS \$1,100.00 per ounce. HENSLEY stated that when HUTSON discovered that STEVENS was selling the cocaine to Raymond HILLIARD for \$1,400.00 per ounce, HUTSON began dealing directly with HILLIARD.

HENSLEY stated that Junior STILTNER was a cocaine source of supply for Gordie STEVENS, Raymond HILLIARD, Nathan STILTNER, and Clyde STILTNER, as well as others.

On June 5, 2008, CS-9 was interviewed in Bristol, VA. CS-9 stated that Bryan LNU was her source of supply for cocaine beginning in the summer of 2006. CS-9 stated that she was with Bryan LNU when he picked up cocaine at the residence of Raymond HILLIARD on approximately three (3) occasions. CS-9 stated that she never witnessed the transactions, but that Bryan LNU exited the residence with cocaine. CS-9 identified HILLIARD's residence as 260 Booher Dr., Bristol, TN.

On July 10, 2008, CS-10 was interviewed in Blountville, TN. CS-10 stated that he/she sold cocaine to and also purchased cocaine from Raymond HILLIARD. CS-10 stated that HILLIARD was supplied cocaine by Kari PARKS' family. CS-10 stated that HILLIARD obtained approximately three (3) to five (5) ounces of cocaine every other day from "Kari's people". CS-10 stated that he/she paid \$1,100.00 to \$1,300.00 per ounce of cocaine purchased from HILLIARD.

On September 23, 2008, CS-14 was interviewed in Kingsport, TN. CS-14 stated that Raymond HILLIARD provided his/her 16 year old daughter with cocaine. CS-14 stated that Rhonda HUTSON dealt cocaine with HILLIARD.

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that his father, Dewayne Jones, obtained one (1) to 1½ ounces of cocaine several times a day from Rhonda HUTSON and Junior STILTNER. KINCER stated that Jones would sell several ounces of cocaine a day to Raymond HILLIARD. KINCER stated that HILLIARD broke down the ounces into "8 balls" (1/8 ounce), grams, and "fifties" (1/2 gram) for resale. KINCER stated that he was at HILLIARD's residence on one occasion when he observed Sam HUTSON drop off what he believed to be cocaine.

On January 6, 2009, CS-17 was interviewed in Blountville, TN. CS-17 stated that Raymond HILLIARD used to be supplied cocaine by Nathan (STILTNER). CS-17 stated that he/she had never purchased cocaine directly from HILLIARD, but was at his residence when others have purchased cocaine from him. CS-17 stated that he/she had transported people to HILLIARD's residence in order to purchase cocaine and pills from HILLIARD.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of ½ ounce of cocaine. In a subsequent interview, HILLIARD stated that he had gone to Johnson City to pick up cocaine for someone and was going to make \$150.00 for the trip. HILLIARD stated that he entered the "drug business" in 2005 when he met Junior STILTNER. HILLIARD stated that he began purchasing "8 balls" (1/8 ounce) of cocaine from STILTNER for \$200.00, but quickly graduated to multiple "8 balls" and then ½ ounces of cocaine at a time. HILLIARD stated that he purchased ½ ounces of cocaine from STILTNER once every week or

two for approximately six (6) months. HILLIARD stated that he picked up the cocaine at the residence of Rhonda HUTSON two (2) or three (3) times a month, and at the residence of Nathan STILTNER one (1) or two (2) times a month. HILLIARD stated that HUTSON lived on Broyles Ln. in Bristol, TN, and Nathan STILTNER lived in the Bristol Heights Trailer Park. HILLIARD stated that Junior STILTNER wanted him to sell more cocaine, but HILLIARD was apprehensive as he did not want to get caught. HILLIARD stated that he had six (6) to eight (8) drug customers to whom he sold cocaine.

On January 14, 2009, CS-18 was arrested with Raymond HILLIARD. In a subsequent interview, CS-18 stated that he/she rode with HILLIARD to Johnson City on several occasions to pick up cocaine. CS-18 stated that HILLIARD let him/her (CS-18) "pinch" from the cocaine as payment for riding along.

CS-18 stated that he/she did handyman type work for HILLIARD at HILLIARD's residence, and was paid mostly in drugs. CS-18 stated that he/she had lived with HILLIARD for a while, and had observed HILLIARD obtain small amounts of cocaine a few times a week for approximately three (3) to four (4) years. CS-18 stated that he/she had personally observed ounces of cocaine at HILLIARD's residence.

On March 5, 2009, CS-19 was interviewed in Bristol, VA. CS-19 stated that during December, 2008, he/she drove his/her cousin to pick up cocaine from Raymond HILLIARD on three (3) occasions. CS-19 stated that on the first occasion, his/her cousin traded stolen merchandise to HILLIARD for twenty (20) dosage units of OxyContin and 1/16 ounce of cocaine. CS-19 stated that this occurred at HILLIARD's brother's house on Arkansas Ave. in Bristol, TN. CS-19 stated that on the second occasion, his/her cousin traded stolen merchandise to HILLIARD for two (2) "8 balls" of cocaine (1/4 ounce). CS-19 stated that this occurred at HILLIARD's residence on Booher Dr. in Bristol, TN. CS-19 stated that on the third occasion, his/her cousin purchased one (1) "8 ball" of cocaine from HILLIARD at his residence. CS-19 stated that his/her cousin told him/her that HILLIARD was supplied cocaine by Kari PARKS.

On May 13, 2009, CS-22 was interviewed in Abingdon, VA. CS-22 stated that Jackson Mabe was a cocaine distributor for Junior STILTNER. CS-22 stated that he/she was with Mabe every day for approximately two (2) to three (3) months when Mabe delivered one (1) or two (2) ounces of cocaine to Raymond HILLIARD on a daily basis. CS-22 stated that these transactions occurred at HILLIARD's residence. CS-22 stated that HILLIARD was paying Mabe \$1,500.00 per ounce of cocaine.

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that between 2006 and June, 2008, he/she and Archie Stone purchased \$50.00 to \$100.00 worth of cocaine from Raymond HILLIARD on a regular basis. CS-24 stated that these transactions occurred at HILLIARD's residence located on Booher Ln.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 366-0132, (423) 383-1347, and (423) 646-4346 under the name "Raymond".

On October 14, 2009, CS-5 made a controlled purchase of approximately one (1) gram of

cocaine from April HILLIARD in Bristol, TN. CS-5 stated that HILLIARD was supplied the cocaine by Gordie STEVENS.

On October 19, 2009, CS-5 made another controlled purchase of approximately one (1) gram of cocaine from April HILLIARD in Bristol, TN.

A criminal history check on Raymond HILLIARD revealed the following arrests: 1971 – Aiding and Abetting Burglary; 2008 – Possession of Schedule II, Possession of Schedule IV (3x), Possession of a Legend Drug, Criminal Attempt to Possess Schedule II, Maintaining a Dwelling (2x), Possession of Drug Paraphernalia (2x); 2009 – Sale and Deliver over ½ Once of Cocaine, Maintain a Dwelling Where Controlled Substance are Used/Sold (2x), Sale of Cocaine.

A criminal history check on April HILLIARD revealed the following arrests: 1996 – Shoplifting/Larceny; 2008 – Possession of Schedule II Narcotics, Possession of Schedule IV Narcotics, Possession of a Legend Drug, Maintaining a Dwelling Where Drugs are Sold (2x), Possession of Drug Paraphernalia (2x).

Bryan Keith PROFFITT

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY provided detailed information regarding Rhonda HUTSON, Shannon HUTSON, and Junior STILTNER. HENSLEY stated that customers of the Drug Trafficking Organization included Jeff HOWELL, Robert PARKS, Josh SNYPES, Sam HUTSON, Bryan PROFFITT, and others.

On May 23, 2008, CS-7 was interviewed in Abingdon, VA. CS-7 stated that Bryan LNU (Last Name Unknown) and Betty Jean Gray rented motel rooms for Oedipus Mumphrey from which to distribute crack cocaine. CS-7 stated that Bryan LNU and Betty Jean Gray also let Mumphrey, Paul Vaughn, Reginald Morton, and others distribute crack cocaine from their trailer which was located on Hwy. 394 in Blountville, TN.

On May 23, 2008, CS-8 was interviewed in Abingdon, VA. CS-8 stated that Bryan PROFFITT and Betty Jean Gray were distributors of crack cocaine for Oedipus Mumphrey. CS-8 stated that PROFFITT and Gray allowed Mumphrey to utilize their trailer, located on Hwy. 394 in Blountville, TN, from which to distribute crack cocaine. CS-8 stated that PROFFITT purchased cocaine in small amounts from Raymond HILLIARD.

On June 5, 2008, CS-9 was interviewed in Bristol, VA. CS-9 stated that he/she was introduced to Bryan LNU (Last Name Unknown) during the summer of 2006. CS-9 stated that he/she purchased approximately three (3) to four (4) grams of cocaine per week from Bryan LNU for \$200.00. CS-9 stated that he/she went with Bryan LNU to the residence of Rhonda HUTSON on several occasions to pick up an ounce of cocaine. CS-9 stated that he/she observed Bryan LNU and Rhonda HUTSON engage in drug transactions on approximately five (5) to ten (10) different occasions. CS-9 stated that he/she also observed Bryan LNU engage in drug transactions with unknown males on the front porch of HUTSON's residence. CS-9 identified HUTSON's residence as 208 Broyles Ln., Bristol, TN.

CS-9 stated that he/she was with Bryan LNU when he (Bryan LNU) picked up cocaine at

the residence of Raymond HILLIARD on approximately three (3) occasions. CS-9 stated that he/she never witnessed the transactions, but that Bryan LNU exited the residence with cocaine. CS-9 identified HILLIARD's residence as 260 Booher Dr., Bristol, TN.

CS-9 stated that, on one occasion when Bryan LNU was out of town (summer of 2007), he (Bryan LNU) provided him/her with the telephone number for Junior STILTNER for the purpose of obtaining cocaine. CS-9 stated that STILTNER was also out of town and told him/her to call Paul Thomas. CS-9 stated that after the first purchase with Thomas, he/she began to purchase $\frac{1}{2}$ ounce to one (1) ounce of cocaine from Thomas on a daily basis.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of cocaine. In a subsequent interview, HILLIARD stated that in 2007, he was informed by Randy PARKS and Bryan PROFFITT that they were awaiting a delivery of cocaine from Shannon HUTSON. HILLIARD stated that PROFFITT told him that PROFFITT preferred Shannon HUTSON's cocaine to Rhonda HUTSON's cocaine because Shannon did not "cut" hers and Rhonda did. HILLIARD stated that in 2008, PROFFITT told him that Rhonda HUTSON was traveling to Washington D.C. to pick up large amounts of OxyContin. HILLIARD stated that PROFFITT used to work for Junior STILTNER in the vinyl siding construction business.

HILLIARD stated that approximately $1\frac{1}{2}$ years ago (summer of 2007), PROFFITT told him that he (PROFFITT), Rhonda HUTSON, and another individual traveled to North Carolina with \$22,000.00 in cash to purchase cocaine. HILLIARD stated that PROFFITT told him that they were "ripped off" by the cocaine supplier. HILLIARD stated that PROFFITT knew the supplier of cocaine that had robbed them.

On August 17, 2009, CS-29 was interviewed in Abingdon, VA. CS-29 positively identified a photograph of Bryan PROFFITT as "Bryan". CS-29 stated that PROFFITT allowed CS-29 and others to stay at his residence and sell cocaine. CS-29 stated that PROFFITT sometimes sold cocaine for CS-29, but he (PROFFITT) had another source of supply for cocaine and pills. CS-29 stated that PROFFITT, at times, had four (4) to fourteen (14) ounces of cocaine in his possession.

CS-29 stated that in 2007, PROFFITT showed up in Burlington, NC and asked CS-29 to sell him two (2) kilograms of cocaine. CS-29 stated that PROFFITT was with others who supposedly had brought \$40,000.00 for the cocaine. CS-29 had PROFFITT meet him/her with \$20,000.00 for one (1) kilogram of cocaine, which CS-29 took without delivering the cocaine.

On September 29, 2009, CS-30 was interviewed in Abingdon, VA. CS-30 stated that Bryan PROFFITT had told him/her that PROFFITT "ripped off" Rhonda HUTSON for \$20,000.00 U.S. Currency when the two of them went to North Carolina to purchase cocaine. CS-30 stated that PROFFITT said that he told HUTSON that he was robbed by black males, but in actuality he split the money with the black male that was supposed to supply the cocaine.

CS-30 stated that PROFFITT told him/her that PROFFITT found nine (9) ounces of cocaine hidden in the ductwork of Phyllis AMOS' trailer after AMOS had been arrested with $\frac{1}{2}$ kilogram of cocaine.

A criminal history check on Bryan PROFFITT revealed the following arrests: 1991 – DUI; 1996 – Distribution of Cocaine, Conspiracy to Distribute Cocaine; 1997 – Domestic

Assault; 2001 – Felony Probation Violation; 2005 – Aggravated Assault; 2007 – Possession of Drug Paraphernalia

Chuck Allen HENSLEY

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that he was the live-in boyfriend of Rhonda HUTSON from November, 2006 to March, 2007. HENSLEY stated that they resided together at 208 Broyles Ln., Bristol, TN. HENSLEY stated that during the time they were together, Rhonda HUTSON sold approximately one (1) kilogram of cocaine per week. HENSLEY stated that he personally made two (2) trips with Rhonda HUTSON to Greensboro, NC to pick up cocaine. HENSLEY stated that on the first trip they picked up 26 ounces of cocaine, and on the second trip they picked up 32 ounces of cocaine.

HENSLEY stated that he and Rhonda HUTSON began a business together called Mid-South Seamless Guttering, which was run from HUTSON's residence located at 208 Broyles Ln., Bristol, TN. HENSLEY stated that HUTSON used drug proceeds (cash) to purchase materials and tools for the business. HENSLEY stated that HUTSON began the company for the purpose of covering up all the drug traffic coming to and from the house.

On July 10, 2008, CS-10 was interviewed in Blountville, TN. CS-10 stated that Rhonda HUTSON was a distributor of prescription pills. CS-10 stated that Chucky HENSLEY, a "runner" for HUTSON, delivered Lortab, Percocet, and OxyContin to his/her residence for his/her spouse.

A criminal history check on Chucky HENSLEY revealed the following arrests: 2002 – Domestic Assault; 2008 – Possession of Schedule IV Narcotics, Theft, ID Theft.

Brandon KINCER

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that he and Paul Thomas were partners in the distribution of cocaine. KINCER stated that he accompanied Thomas to the residence of Rhonda HUTSON on many occasions to purchase cocaine. KINCER stated that he co-mingled his money with Thomas to purchase the cocaine. KINCER stated that he never co-mingled more than \$2,000.00 with Thomas' money. KINCER stated that in 2007, Thomas purchased ten (10) ounces of cocaine from HUTSON approximately every four (4) or five (5) days for four (4) or five (5) months. KINCER stated that he and Thomas took the cocaine to Thomas' residence (located in Bristol, VA) and broke it down into smaller quantities for resale. KINCER stated that he would receive one (1) or 1½ ounces out of the ten (10) ounces of cocaine purchased from HUTSON. KINCER stated that Thomas provided him (KINCER) with cocaine for \$900.00 per ounce.

KINCER stated that he had purchased cocaine from Randy PARKS on approximately fifteen (15) different occasions, 1/8 ounce to one (1) ounce at a time. KINCER stated that he had purchased 1/8 ounce of cocaine and eight (8) to ten (10) dosage units of OxyContin from Josh SNYPES on multiple occasions. KINCER stated that he had purchased ¼ ounces of cocaine from Robert PARKS on seven (7) different occasions. KINCER stated that he had purchased ounces of cocaine from Kevin ROARK.

A criminal history check on Brandon KINCER revealed no prior arrests.

Robert Henry NELSON, III (AKA Bobby NELSON)

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that between 2004 and 2005, he became addicted and smoked cocaine exclusively for approximately one (1) year. STEVENS stated that he spent approximately \$65,000.00 on cocaine that year. STEVENS stated that he obtained that cocaine from Raymond HILLIARD, Bobby NELSON, and Dave Holt.

On February 8, 2008, CS-4 was interviewed in Bristol, TN. CS-4 stated that he/she was present at the trailer of Bobby NELSON when Shannon HUTSON delivered cocaine to NELSON. CS-4 stated that he/she observed HUTSON deliver one (1) kilo to NELSON on one (1) occasion, and $\frac{1}{2}$ kilo to NELSON on another occasion. CS-4 stated that NELSON informed him/her that HUTSON charged NELSON \$1,100.00 per ounce of cocaine.

On March 13, 2008, Carrie Evelyn JARRETT was interviewed in Bristol, TN. JARRETT stated that in 2006, she drove Bobby NELSON to the residence of Shannon HUTSON to pick up $\frac{1}{2}$ ounce of cocaine. JARRETT stated that NELSON informed her that he was paying HUTSON \$1,100.00 per ounce of cocaine. JARRETT stated that she was present between October and December, 2007 when HUTSON made approximately 25 deliveries to NELSON at his residence. JARRETT stated that during this time period, NELSON obtained approximately 15 to 20 ounces of cocaine from HUTSON.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY stated that when Bobby NELSON was arrested on drug charges, Shannon HUTSON offered to pay for his bond or hire him an attorney. HENSLEY stated that HUTSON ended up paying \$10,000.00 to Rick Spivey to represent NELSON.

On June 3, 2008, Bobby NELSON called Shannon HUTSON from the Sullivan County Jail. NELSON told HUTSON that he and Sam HUTSON were in the same cell. Shannon HUTSON told NELSON to tell Sam HUTSON to sign his property over to her, as the money he had belonged to her.

On February 18, 2009, NELSON called Shannon HUTSON from the Sullivan County Jail. NELSON thanked HUTSON for hiring Rick Spivey, but stated that he (Spivey) didn't do anything for his case.

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that he/she used to live with Bobby NELSON. CS-24 stated that while living with NELSON, he/she helped NELSON cut up and distribute cocaine. CS-24 stated that he/she observed Carrie JARRETT deliver $\frac{1}{4}$ ounce to $\frac{1}{2}$ ounce of cocaine at a time to NELSON.

On December 9, 2009, CS-33 was interviewed in Blountville, TN. CS-33 stated that Bobby NELSON, his wife Debbie Nelson, and his girlfriend Joella, were all distributors of cocaine for Shannon HUTSON.

A criminal history check on Bobby NELSON revealed the following arrests: 1977 – Burglary; 1979 – Burglary of an Auto, Aggravated Assault of a Police Officer, Resisting Arrest; 1981 – DUID, Disorderly Conduct; 1998 – DWI; 2008 – Possession of a Schedule II, Maintaining a Dwelling Where Drugs are Sold or Used, Unlawful Drug Paraphernalia.

Carrie Evelyn JARRETT

On March 13, 2008, Carrie Evelyn JARRETT was interviewed in Bristol, TN. JARRETT stated that in 2006, she drove Bobby NELSON to the residence of Shannon HUTSON to pick up $\frac{1}{2}$ ounce of cocaine. JARRETT stated that NELSON informed her that he was paying HUTSON \$1,100.00 per ounce of cocaine. JARRETT stated that she was present between October and December, 2007 when HUTSON made approximately 25 deliveries to NELSON at his residence. JARRETT stated that during this time period, NELSON obtained approximately 15 to 20 ounces of cocaine from HUTSON. JARRETT stated that on one occasion, HUTSON called NELSON to tell him that she would be out of town and she was leaving the cocaine with Kari (PARKS). JARRETT stated that she was at the residence of NELSON when he took delivery of cocaine from PARKS on two (2) occasions.

JARRETT stated that she had been with Mike TAYLOR when he took delivery of cocaine from Kari PARKS at the International House of Pancakes located at exit 7 in Virginia. JARRETT stated that she and TAYLOR used the cocaine together after the purchase from PARKS.

JARRETT stated that between June and August, 2007, she obtained $\frac{1}{2}$ to 1 gram of cocaine two (2) to three (3) times a week from Raymond HILLIARD.

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that he used to live with Bobby NELSON. CS-24 stated that he observed Carrie JARRETT deliver $\frac{1}{4}$ ounce to $\frac{1}{2}$ ounce of cocaine at a time to NELSON.

On September 17, 2009, a Bristol, TN Police Department CS was utilized to purchase 10 dosage units of Lortab from JARRETT in Bristol, TN.

On September 22, 2009, the same CS was utilized to purchase 5 $\frac{1}{2}$ dosage units of Lortab from JARRETT in Bristol, TN.

A criminal history check on Carrie JARRETT revealed the following arrests. 2007 – Possession of a Controlled Substance, Public Intoxication.

Samuel Swayne HUTSON

On December 17, 2007, Gordie STEVENS was interviewed in Bristol, TN. STEVENS stated that he had been obtaining large amounts of cocaine from Rhonda HUTSON for years. STEVENS stated that Sam HUTSON was a cocaine distributor for Rhonda HUTSON, his sister.

On February 5, 2008, a State of Tennessee search warrant was executed at 260 Booher Dr., Bristol, TN – the residence of Raymond and April HILLIARD. Also present at the residence was Samuel Swayne HUTSON and Callie Eads. Seized pursuant to the search warrant

were four (4) crack pipes, three (3) sets of digital scales, other drug paraphernalia with cocaine residue, a cane sword, and \$961.00 in U.S. Currency. Raymond and April HILLIARD, as well as Sam HUTSON were arrested.

On May 14, 2008, Chucky HENSLEY was interviewed in Blountville, TN. HENSLEY provided detailed information regarding Rhonda HUTSON, Shannon HUTSON, and Junior STILTNER. HENSLEY stated that customers of the Drug Trafficking Organization included Jeff HOWELL, Robert PARKS, Josh SNYPES, Sam HUTSON, Bryan PROFFITT, and others.

On June 2, 2008, Sam HUTSON called Shannon HUTSON from the Sullivan County Jail. Sam HUTSON told Shannon HUTSON that he had a ¼ ounce. Shannon HUTSON asked Sam HUTSON if he could have gotten rid of it. Sam HUTSON told Shannon HUTSON that he could not get rid of it.

On June 3, 2008, Bobby NELSON called Shannon HUTSON from the Sullivan County Jail. NELSON told HUTSON that he and Sam HUTSON were in the same cell. Shannon HUTSON told NELSON to tell Sam HUTSON to sign his property over to her, as the money he had belonged to her.

On June 4, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Kristin Gray. HUTSON stated that there were three telephone numbers saved in his phone under the names Sam, Tammy, and Rae. HUTSON stated that Tammy was good for \$200.00 to \$300.00 per week, and told Gray to charge her \$600.00 for a half and \$1,200.00 for a whole. HUTSON told Gray to charge Sam \$500.00 for a half and \$1,000.00 for a whole. HUTSON stated that Rae usually got a quarter for \$350.00 or a half for \$600.00. HUTSON told Gray that Sinbad was the same as Rae.

On June 11, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Kristin Gray. HUTSON stated to Gray, "If I would have sold him the stuff, instead of keeping it in my pocket, I could be where he is now."

On July 1, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Rhonda HUTSON. Rhonda HUTSON told Sam HUTSON that she was glad that Sam beat up Chucky (HENSLEY) because he was a "snitch". Sam HUTSON told Rhonda HUTSON that he was caught with 4 grams of cocaine that he didn't even realize he had. In a subsequent call, Sam HUTSON told Rhonda HUTSON that he had Chucky doused with piss & sour milk.

On July 3, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Junior STILTNER. STILTNER stated that there were tires to sell and he did not have any. HUTSON told STILTNER that he (HUTSON) could hook STILTNER up with a number.

On November 26, 2008, Sam HUTSON placed a telephone call from the Sullivan County Jail to Kristen Gray. Gray told HUTSON that she (Gray) had not been able to talk to Shannon. Gray stated that she "met with Shannon at the Food City and talked a while one time, but here lately I guess she doesn't want Kari to know. It's been real quick."

On December 1, 2008, Brandon KINCER was interviewed in Bristol, TN. KINCER stated that Sam HUTSON was the brother of Shannon and Rhonda HUTSON. KINCER stated that he was at Raymond HILLIARD's residence on one occasion when he observed Sam HUTSON drop off what he believed to be cocaine.

On January 14, 2009, Raymond HILLIARD was arrested in Blountville, TN in possession of cocaine. In a subsequent interview, HILLIARD stated that Sam HUTSON told him that HUTSON received cocaine from his sister, Shannon HUTSON.

On February 22, 2009, Sam HUTSON placed a telephone call from the Sullivan County Jail to Kari PARKS. HUTSON told PARKS that Kristin (Gray) had been arrested and that he thought she was "snitching". PARKS asked HUTSON if Raymond (HILLIARD) was in jail. HUTSON told PARKS about HILLIARD and another person getting arrested.

On May 13, 2009, CS-22 was interviewed in Abingdon, VA. CS-22 stated that many years ago, Rhonda STILTNER (HUTSON), Shannon PARKS (HUTSON), and Sam HUTSON lived with their mom (Phyllis AMOS) on Flatwood Rd. in Hickory Tree, TN. CS-22 stated that he/she lived nearby and knew the family. CS-22 stated that he/she made small purchases of cocaine, no more than "8 balls" (1/8 ounce of cocaine), from Rhonda, Shannon and Sam. CS-22 stated that Sam HUTSON also sold him/her 1/4 pounds of marijuana.

On June 25, 2009, CS-24 was interviewed in Blountville, TN. CS-24 stated that the source of supply of cocaine for Gordie STEVENS was a white male named Sammy LNU (Last Name Unknown). CS-24 described Sammy LNU as having a dark complexion, black hair, and was approximately 40 years old. CS-24 stated that Sammy LNU was a block mason who lived in a brick house on Pleasant Grove Rd. near Sullivan East H.S. and Pratt's Store.

On July 7, 2009, CS-25 was interviewed in Abingdon, VA. CS-25 stated that Sam HUTSON was the brother to Rhonda and Shannon HUTSON. CS-25 stated that Sam HUTSON had a reputation in the community as a distributor of cocaine and marijuana. CS-25 stated that he/she once observed HUTSON in possession of a small amount of "ice" (crystal methamphetamine).

On July 23, 2009, CS-27 was interviewed in Abingdon, VA. CS-27 stated that during the summer of 2008, he/she began purchasing small amounts of cocaine from Shannon HUTSON. CS-27 stated that when Sam HUTSON (Shannon HUTSON's brother) went to jail (fall 2008), Shannon HUTSON approached him/her (CS-27) about selling larger amounts of cocaine. CS-27 stated that he/she obtained approximately 1/2 ounce to one (1) ounce of cocaine from Shannon HUTSON once or twice a week until January, 2009. CS-27 stated that he/she took over some of Sam HUTSON's cocaine customers.

On July 29, 2009, Kari PARKS was arrested in Blountville, TN. PARKS stated that her uncle, Sam HUTSON, used to live with Raymond HILLIARD and was "hooked" on cocaine.

A criminal history check on Sam HUTSON revealed the following arrests: 1992 – Simple Assault, Indecent Exposure; 1993 – Larceny from Auto; 1996 – Fugitive from Justice; 1999 –

Theft of Property; 2001 – Theft over \$500.00, Theft over \$1,000.00, Aggravated Burglary; 2006 – Possession of a Controlled Substance; 2007 – Possession of Schedule II, Possession of Drug Paraphernalia, DUI, Resisting Arrest, Aggravated Assault, Felony Evading; 2008 – Possession of Drug Paraphernalia.

Isaac Andrew SMITH

On December 25, 2008, Agents of the 1st Judicial District Drug Task Force in Washington County, Tennessee executed a search warrant in Johnson City, TN. Present at the time of the search warrant was CS-16. When asked the location of his/her vehicle, CS-16 stated that he/she traded the vehicle to Isaac SMITH for seventy-five (75) dosage units of 80 mg OxyContin. CS-16 stated that SMITH asked him/her to write a statement that he/she (CS-16) sold the vehicle to SMITH for cash, but CS-16 refused, stating that he/she did not want to lie.

On February 10, 2009, SCSO Sgt. Burk Murray and Det. Ray Hayes observed Isaac SMITH as the passenger in a red Chevrolet Tahoe, TN license 401 QPW. Sgt. Murray and Det. Hayes had prior knowledge of this vehicle being owned by Matthew COX, husband of Shannon HUTSON. As of June 29, 2009, the records of the State of Tennessee revealed that TN license 401 QPW returned to a 1997 Chevrolet registered to Isaac SMITH at 571 Buncombe Rd., Blountville, TN.

On February 12, 2009, Sgt. Burk Murray observed Isaac SMITH arrive at 212 Neeley Dr., Blountville, TN (residence of Shannon HUTSON and Kari PARKS) as the passenger in a Lexus sedan. Sgt. Murray observed SMITH enter the residence while the driver of the Lexus remained in the vehicle. Approximately ten (10) minutes later, Sgt. Murray observed SMITH exit the residence and depart as the passenger in the Lexus sedan.

On March 1, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications with telephone number (423) 914-0438 (Isaac SMITH):

12:21 p.m. – (PARKS) “Hey baby.”
12:22 p.m. – (SMITH) “What up?”
12:30 p.m. – (PARKS) “Fixin to take Kyle to a movie or fun adventure or something n tryn to find a couple things b4 I go. R u doin anything baby?”
1:13 p.m. – (PARKS) “I got the money 4 em baby n my friend wants 10-15. Y aint u sayn ne thing? Cause mom?”

On March 26, 2009, telephone number (423) 646-6320 (Kari PARKS) engaged in the following text message communications with telephone number (423) 612-1307 (Shannon HUTSON):

3:08 p.m. – (PARKS) “Did u leave anything?”
3:16 p.m. – (HUTSON) “No.”
3:17 p.m. – (HUTSON) “Ask J or I can ask Isac.”

Based on my training and experience, I believe that the preceding text message communications between Isaac SMITH, Kari PARKS, and Shannon HUTSON were in furtherance of drug trafficking activities. I believe that SMITH supplied PARKS with

OxyContin when it was unavailable from HUTSON.

On April 8, 2009, CS-20 was interviewed in Blountville, TN. CS-20 stated that he/she had known Isaac SMITH for approximately 20 years. CS-20 stated that he/she had purchased Lortabs directly from SMITH. CS-20 stated that SMITH was currently a distributor of OxyContin, and acted as a middleman for the distribution of hundreds of pills. CS-20 stated that SMITH's cellular telephone number was (423) 914-0438.

On April 27, 2009, the aforementioned red Chevrolet Tahoe, TN license 401 QPW (registered to Isaac SMITH), was observed at 212 Neeley Dr., Blountville, TN (residence of Shannon HUTSON). HUTSON and Jonathan LEONARD were both observed meeting with the occupant(s) of the vehicle.

On May 25, 2009, CS-23 was arrested in Russell County, VA in possession of eight (8) dosage units of 80 mg OxyContin. CS-23 stated that Isaac SMITH had "fronted" the pills to him/her, with the understanding that he/she would pay SMITH back \$70.00 per pill. CS-23 stated that his/her usual source of supply for OxyContin was Matt Harr, who was a distributor for SMITH. CS-23 stated that SMITH's cellular telephone number was (423) 341-5740.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones was telephone number (423) 341-5740 under the name "I" and "Is", and telephone number (423) 914-0438 under the name "Isac".

On July 23, 2009, telephone number (276) 791-4026 (Isaac SMITH) engaged in the following text message communications with telephone number (423) 646-6320 (Kari PARKS):

8:08 p.m. – (PARKS) "Where u at?"
8:08 p.m. – (SMITH) "Call me."
8:09 p.m. – (PARKS) "Who is this?"
8:09 p.m. – (SMITH) "Isaac."
8:18 p.m. – (PARKS) "O okay. I will call u darlin'."

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 914-0438 and (276) 791-4026 under the names "Isaac" and "Isac".

On September 1, 2009, Shawn BULLEN was arrested in possession of 57 dosage units of 80 mg OxyContin, \$3,721.00, and two (2) handguns. Subsequent to his arrest, BULLEN was interviewed by law enforcement. BULLEN stated that Isaac LNU (Last Name Unknown) had recruited him (BULLEN) to take delivery of 300 dosage units of OxyContin from Mark LNU. BULLEN stated that Mark LNU was from Michigan and wanted to deliver the OxyContin on Thursday, September 3, 2009. BULLEN stated that Isaac LNU was a "big, huge, fat guy." (According to the records of the Tennessee DMV, Isaac SMITH is listed at 6'03", 280 lbs.)

A search of BULLEN's cellular telephones revealed telephone number (423) 914-0438 saved under the name Isaac. Saved under the name Mark Michigan was telephone number (734)

369-7343.

On November 20, 2009, Whitney CUTSHAW was interviewed in Kingsport, TN. CUTSHAW stated that she had been with Isaac SMITH when he picked up 200 to 300 dosage units of OxyContin from Shannon HUTSON. CUTSHAW stated that SMITH met HUTSON at various places, including a trailer, a motel, and a storage unit, where HUTSON motioned toward a vehicle and SMITH retrieved a manila envelope containing the drugs. CUTSHAW stated that she observed SMITH give a shopping bag full of cash to HUTSON in exchange for a manila envelope containing drugs. CUTSHAW stated that she had assisted SMITH in dividing up and packaging the OxyContin for SMITH's distributors.

CUTSHAW stated that she had been with SMITH when he obtained OxyContin from Matt COX. CUTSHAW stated that SMITH only went to COX when HUTSON was out of town obtaining drugs. CUTSHAW stated that HUTSON traveled long distances to obtain OxyContin. CUTSHAW stated that SMITH told her that HUTSON was his supplier for cocaine and OxyContin.

CUTSHAW stated that she had observed SMITH in possession of large amounts of U.S. Currency. CUTSHAW stated that SMITH kept money in both pants pockets – spent out of one and put drug proceeds in the other. CUTSHAW stated that she had seen SMITH with as much as \$12,000.00 at a time, and no less than \$4,000.00.

CUTSHAW stated that SMITH purchased a pre-paid cellular telephone every time he went to Wal-Mart. CUTSHAW stated that SMITH purchased pre-paid cellular telephones for himself and his sub-distributors. CUTSHAW stated that the most recent pre-paid numbers for SMITH were (423) 956-7288 and (423) 341-9048. CUTSHAW stated that SMITH's personal cell phone number was (423) 914-0438.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Isaac SMITH (423-914-0438, 423-341-5740, 276-791-4026) attempted to contact Shannon HUTSON's cellular telephones approximately 862 times between 02/20/2008 and 08/12/2009. The telephones subscribed to and/or utilized by Isaac SMITH attempted to contact Kari PARKS' cellular telephones approximately 58 times between 11/22/2008 and 07/23/2009.

A criminal history check on Isaac SMITH revealed the following arrests: 2005 – Sales of Cocaine, Delivery of Cocaine.

Shawn Michael BULLEN

On June 17, 2009, surveillance was conducted at 212 Neeley Dr., Blountville, TN (residence of Shannon HUTSON and Kari PARKS). At approximately 7:30 p.m., Shannon HUTSON departed the residence in the tan Chevrolet Tahoe registered to Phyllis AMOS. HUTSON was followed to 389 Elizabethton Hwy., Bluff City, TN where she met with Shawn BULLEN. Agents were unable to determine if any exchange was made at that time.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones was telephone number (423) 366-9689 under the names "SB" and "Shawn", and telephone number

(423) 383-0331 under the name "Shawn".

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones were telephone numbers (423) 366-9689 and (423) 383-0331 under the name "Shawn B".

On August 26, 2009, a SCSO CS was interviewed in Blountville, TN. The CS stated that earlier that day, he/she had been at the residence of Shawn BULLEN (389 Elizabethton Hwy., Bluff City, TN) and observed a large amount of cash. BULLEN told the CS that BULLEN was waiting to "re-up" (replenish his supply of OxyContin). BULLEN told the CS to leave while the delivery was made, then BULLEN would call the CS to return.

On August 28, 2009, the SCSO CS purchased six (6) dosage units of OxyContin for \$480.00 from Shawn BULLEN at 389 Elizabethton Hwy., Bluff City, TN.

On August 31, 2009, the same CS purchased five (5) dosage units of OxyContin for \$400.00 from Shawn BULLEN at 389 Elizabethton Hwy., Bluff City, TN.

On August 31, 2009, a search warrant was executed at 389 Elizabethton Hwy., Bluff City, TN, the residence of Shawn BULLEN. BULLEN was arrested in possession of 57 dosage units of 80 mg OxyContin, \$3,721.00, and two (2) handguns.

Subsequent to his arrest, BULLEN was interviewed by law enforcement. BULLEN stated that his source of supply for OxyContin was Shannon HUTSON. BULLEN stated that he had been supplied approximately 60 dosage units of OxyContin each week for approximately one (1) year by HUTSON. BULLEN stated that he had two (2) sub-distributors who sold the OxyContin for him. Additionally, BULLEN stated that he had a 25 pill a day addiction to OxyContin, as well as 150 mg of methadone each day.

A search of BULLEN's cellular telephones revealed the following telephone numbers under the name Shannon: (423) 963-5717, (423) 742-1452, (276) 791-2529, (423) 956-6489, (276) 791-0685, (423) 534-0230, (423) 742-5758, (423) 341-2779, (423) 956-2493, and (423) 742-5822. Saved under the name Kari were the following telephone numbers: (423) 646-6320, (423) 323-7382, and (423) 534-4518. Saved under the name Isaac was telephone number (423) 914-0438.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Shawn BULLEN (423-366-9689, 423-383-0331) attempted to contact Shannon HUTSON's cellular telephones approximately 550 times between 03/20/2008 and 07/28/2009. The telephones subscribed to and/or utilized by Shawn BULLEN attempted to contact Kari PARKS' cellular telephones approximately 144 times between 05/28/2008 and 07/15/2009.

A criminal history check on Shawn BULLEN revealed the following arrests: 2009 – Resisting Arrest, Aggravated Assault, Simple Assault.

Joshua Adam FRAZIER

On April 8, 2009, CS-20 was interviewed in Blountville, TN. CS-20 stated that Josh

LNU (Last Name Unknown) was a distributor of OxyContin for Isaac SMITH. CS-20 stated that Josh LNU lived at 571 Buncombe Rd., Blountville, TN with Isaac SMITH's sister, Katie Smith. CS-20 stated that from September to December, 2008, he/she purchased six dosage units of OxyContin on a daily basis from Josh LNU. CS-20 stated that Josh LNU was charging him/her \$80.00 per pill. CS-20 stated that during the same time period, he/she knew that Josh LNU was selling approximately one (1) ounce of cocaine per week. CS-20 stated that on two (2) separate occasions, he/she observed Josh LNU in possession of over 200 dosage units of OxyContin.

On April 15, 2009, a controlled purchase of six dosage units of 80 mg OxyContin was conducted from Joshua FRAZIER at 571 Buncombe Rd., Blountville, TN. The CS stated that FRAZIER placed the pills in a plastic bag, then wiped his prints from the bag. The CS stated that he/she observed approximately thirty (30) to forty (40) dosage units of OxyContin on top of a dresser. The CS stated that he/she observed a large amount of U.S. Currency in a plastic bag located in the dresser drawer from which FRAZIER retrieved the plastic bag.

On July 23, 2009, an SCSO CS made a controlled purchase of two (2) dosage units of 80 mg OxyContin from Nikki WIGGS in Bristol, TN. Upon the arrival of the CS at WIGGS' apartment, the CS gave \$200.00 prerecorded funds to WIGGS for the purchase. WIGGS told the CS that the lady that was taken off the interstate recently with 1,800 OxyContin pills, 1,300 Lortabs and \$8,000.00 was the supplier of the pills. Surveillance followed WIGGS to 571 Buncombe Rd., Blountville, TN (residence of Joshua FRAZIER), where it appeared WIGGS obtained the pills. Surveillance followed WIGGS back to her apartment where she gave the pills to the CS.

On November 20, 2009, CS-32 was interviewed in Kingsport, TN. CS-32 stated that Isaac SMITH had a brother in law named Josh LNU (Last Name Unknown). CS-32 stated that SMITH's sister and Josh LNU supposedly flushed a kilogram of cocaine down the toilet when they heard that the police were coming to their residence. Because of this, SMITH owed money to Shannon HUTSON and had to pay \$10.00 extra per dosage unit of OxyContin until the debt was satisfied.

A criminal history check on Josh FRAZIER revealed the following arrests: 2001 – Assault; 2002 – Criminal Damaging; 2003 – Assault (2x), Criminal Damaging, Robbery; 2007 – Domestic Assault, Resisting Arrest, Public Intoxication.

Nikki D. WIGGS

On June 5, 2009, a SCSO CS was interviewed in Blountville, TN. The CS stated that Nikki WIGGS was the CS' source of supply for OxyContin. The CS stated that WIGGS was supplied by Shannon HUTSON.

On June 19, 2009, a controlled purchase of five (5) dosage units of 60 mg OxyContin was conducted from Nikki WIGGS and Chase Hayes. An SCSO CS was utilized to place telephone calls to telephone number (423) 967-5169 and order the pills from WIGGS. The CS, accompanied by Detective Dennis Ford (acting in an undercover capacity), purchased the pills for \$350.00 (pre-recorded buy funds) from WIGGS and Hayes.

On June 30, 2009, Shannon HUTSON and Jonathan LEONARD were arrested in possession of 1,827 dosage units of 80 mg OxyContin, 1,333 dosage units of Lortab, and \$7,280.00 U.S. Currency. Saved in the Contacts List of HUTSON's cellular telephones were telephone numbers (423) 342-0643 and (423) 967-5169 under the name "Nikki".

On July 23, 2009, an SCSO CS made a controlled purchase of two (2) dosage units of 80 mg OxyContin from Nikki WIGGS in Bristol, TN. Upon the arrival of the CS at WIGGS' apartment, the CS gave \$200.00 prerecorded funds to WIGGS for the purchase. WIGGS told the CS that the lady that was taken off the interstate recently with 1,800 OxyContin pills, 1,300 Lortabs and \$8,000.00 was the supplier of the pills. Surveillance followed WIGGS to 571 Buncombe Rd., Blountville, TN (residence of Joshua FRAZIER), where it appeared WIGGS obtained the pills. Surveillance followed WIGGS back to her apartment where she gave the pills to the CS.

On July 27, 2009, Kari PARKS was arrested in Blountville, TN. Saved in the Contacts List of PARKS' cellular telephones was telephone number (423) 967-5169 under the name "Nikki". According to the records of Sprint, telephone number (423) 967-5169 is subscribed to by James Botts at 146 Keith Rd., Apt. 4, Bristol, TN (WIGGS' address).

According to telephone toll analysis, the telephones subscribed to and/or utilized by Nikki WIGGS (423-967-5169, 423-342-0643) attempted to contact Shannon HUTSON's cellular telephones approximately 296 times between 10/27/2008 and 02/23/2009. The telephones subscribed to and/or utilized by Nikki WIGGS attempted to contact Kari PARKS' cellular telephones approximately 18 times between 12/25/2008 and 01/13/2009.

A criminal history check on Nikki WIGGS revealed no prior arrests.

Ladonna Renee CARNETT

On June 11, 2009, surveillance observed Ladonna Renee CARNETT at 212 Neeley Dr., Blountville, TN (residence of Shannon HUTSON).

On July 8, July 14, and on July 20, 2009, a black Chevrolet Cavalier, TN license 590 VLS, was observed at 212 Neeley Dr., Blountville, TN. The records of the State of Tennessee revealed that TN license 590 VLS returned to a 1998 Chevrolet 4 door, registered to Ladonna CARNETT at P.O. Box 1338 Morristown, TN.

On November 12, 2009, surveillance was conducted on a gray Nissan Maxima, TN license 175 QPT, as it traveled from Blountville, TN to Dearborn Heights, MI. The records of the State of Tennessee revealed that TN license 175 QPT returned to a gray 2008 Nissan 4 door registered to April HUTSON at 212 Neeley Dr., Blountville, TN.

At approximately 6:00 p.m., a traffic stop was conducted on the aforementioned Nissan Maxima in Knox County, TN. As the result of a consent search of the Nissan Maxima, approximately 1,173 dosage units of OxyContin were seized from a Victoria's Secret bag. The operator of the vehicle, Ladonna CARNETT, was placed under arrest.

During a subsequent interview with CARNETT, she stated that she was coming from an unknown location in Michigan. CARNETT stated that she had been asked to travel from Tennessee to Michigan and meet with a person unknown to her. CARNETT stated that she met this unknown man in the parking lot of a Walgreens Pharmacy, where she gave a Victoria's Secret bag to him. CARNETT stated that the man then directed her to meet him in the parking lot of a restaurant across the street. CARNETT stated that when they met at the restaurant, the unknown man gave the same bag back to her and they parted ways. CARNETT stated that she did not know what was in the bag prior to giving it to the unknown man, and that she did not know what was in the bag after he returned it to her. CARNETT stated that she had made this trip on at least two (2) occasions.

CARNETT stated that she had been asked to make the trip to Michigan by a friend. CARNETT refused to speak about for whom she made the trip, but stated that the owner of the vehicle was recently arrested with "\$158,000.00 worth of this stuff" and that "it's not hard to figure out." When asked again about the person for whom CARNETT was making the trip, CARNETT stated that "she's my friend" and that "she is a good person." CARNETT left agents with the impression that the owner of the Nissan Maxima (Shannon HUTSON) had asked CARNETT to travel to Michigan for the purpose of obtaining OxyContin.

According to telephone toll analysis, the telephones subscribed to and/or utilized by Ladonna CARNETT (423-839-3154, 828-260-8258) attempted to contact Shannon HUTSON's cellular telephones approximately 284 times between 04/26/2009 and 09/04/2009. The telephones subscribed to and/or utilized by Ladonna CARNETT attempted to contact Kari PARKS' cellular telephones approximately 1 time on 06/10/2009.

A criminal history check on CARNETT revealed the following arrests: 2004 – Driving on Suspended; 2007 – Leaving the Scene of an Accident, Driving on Suspended, Driving on Revoked, DUI; 2008 – Driving on Revoked; 2009 – Possession of Schedule II for Resale.

Whitney Lashea CUTSHAW

On November 16, 2009, the 2nd Judicial District Drug Task Force (Sullivan County, TN) made a controlled purchase of two (2) dosage units of 80 mg OxyContin from Whitney CUTSHAW.

On November 20, 2009, CUTSHAW was interviewed in Kingsport, TN. CUTSHAW stated that she had previously been socially involved with Isaac SMITH. CUTSHAW stated that she had been with SMITH on several occasions when he purchased large amounts of OxyContin from Shannon (HUTSON). CUTSHAW stated that on one (1) occasion SMITH obtained 200 to 300 dosage units of OxyContin from HUTSON at a local motel, and CUTSHAW assisted SMITH in counting out the pills and packaging them for distribution. CUTSHAW stated that on another occasion SMITH obtained a manila envelope full of OxyContin from HUTSON at a storage facility, and CUTSHAW helped separate, count and package the pills for distribution. CUTSHAW stated that she and SMITH had obtained ten (10) dosage units of OxyContin from Matthew COX on one (1) occasion.

CUTSHAW stated that she was addicted to OxyContin and used SMITH as her supplier. CUTSHAW stated that she sold some of the pills supplied to her by SMITH. CUTSHAW stated

that her last interaction with SMITH was when she robbed him of 100 dosage units of OxyContin, which she split with friends.

On December 10, 2009, a search warrant was executed at 531 Bancroft Chapel Rd., Lot 31, Kingsport, TN, the residence of Whitney CUTSHAW. Seized pursuant to the search warrant were over $\frac{1}{2}$ ounce of crack cocaine, one dosage unit of OxyContin, three (3) dosage units of Percocet, one (1) dosage unit of Suboxone, and a small bag of marijuana. CUTSHAW was arrested and charged with possession with the intent to distribute.

A criminal history check on CUTSHAW revealed the following arrests: 2009 (Jan.) – Possession of a Schedule II, Possession of Drug Paraphernalia.

Cooperating Sources

Throughout this affidavit your affiant will identify several individuals by name and several as Cooperating Sources (CS) which were interviewed during this investigation. Your affiant believes the information provided by them, and included in this affidavit, to be credible and reliable for the following reasons: the debriefings included statements against their own penal interest, the information provided by them matched information received from other sources, and much of this information was confirmed by other investigative methods. Some of these methods included surveillances and records acquired during the investigation, including records of phone calls between the co-conspirators.

CS' are utilized for several reasons: a CS might be a member of the target organization and therefore have easy access to information needed by law enforcement; a CS might have a relationship with members of the target organization, making it easy to purchase and/or locate illegal substances, profits, etc.; and in many situations a CS provides to law enforcement the opportunity to infiltrate an organization when all other means are exhausted.

CS-2, CS-3, CS-6, CS-7, CS-8, CS-11, CS-12, CS-14, CS-15, CS-17, CS-18, CS-19, CS-20, CS-22, CS-23, CS-24, CS-25, CS-27, CS-28, CS-29, CS-30, CS-31, and CS-33 were all arrested for violations of the law, most of which were drug distribution charges. The CS' provided information on other crimes, including drug traffickers, in return for consideration for reduced sentences.

CS-1, CS-16, CS-21, CS-32 and CS-34 provided information to law enforcement in return for consideration for charges which had not yet been brought against them.

CS-4, CS-5, CS-9 and CS-13 cooperated with law enforcement in return for monetary compensation, making undercover purchases of narcotics which led to successful prosecutions. CS-9 is now deceased.

CS-10 cooperated with law enforcement and received no compensation.

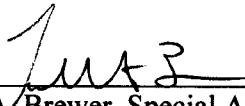
Telephone Toll Analysis

Based on my training and experience, I know the following: Distributors of narcotics, including but not limited to cocaine and OxyContin, communicate extensively by the use of

cellular telephones. These cellular telephone are often in the names of other people or non-existent persons with fraudulent addresses to avoid law enforcement detection. Drug distributors often change cellular telephones and/or cellular telephone numbers to further avoid detection by law enforcement.

Throughout this investigation, agents utilized Administrative Subpoenas and Court Orders to gather subscriber information and toll records on the Shannon HUTSON Drug Trafficking Organization. Although the subscriber information was inaccurate and incomplete in some cases, agents were able to identify the users through various means (debriefings, surveillance, search warrants, arrests, etc.). The collection of toll records also presented a challenge as many cellular telephone numbers were changed throughout the investigation. The information received from the telephone companies was accurate, however was not complete because of the time lost while tracking down new cellular telephone numbers. The frequencies listed in this affidavit are accurate based upon the information received by law enforcement. The information received allowed agents to further link specific events to the organization, and also allowed agents to discount certain events that were not relevant to the overall conspiracy.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on January 11, 2010, at Abingdon, Virginia.



Todd A. Brewer, Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED TO BEFORE ME
THIS 11th DAY OF JANUARY, 2010



HONORABLE JUDGE PAMELA MEADE SARGENT
UNITED STATES DISTRICT COURT IN THE
WESTERN DISTRICT OF VIRGINIA

Reviewed by: 

Zachary Lee
Assistant United States Attorney
Western District of Virginia, Abingdon